



ACTION MEMORANDUM

DATE:

SUBJECT: Request for a 12-Month Exemption at the Sweet Kleen Laundry Site,
Buffalo, Erie County, New York

FROM: Kevin M. Matheis, On-Scene Coordinator
Removal Action Branch

TO: George Pavlou, Director
Emergency and Remedial Response Division

THRU: Joe Rotola, Chief
Removal Action Branch

Site ID#: UQ

I. PURPOSE

The purpose of this Action Memorandum is to request and document approval of a 12-Month Exemption for the ongoing removal action for the Sweet Kleen Laundry Site (Site), located at 760 Kensington Avenue, Buffalo, Erie County, New York, 14215. The proposed project ceiling will remain at \$887,000, of which \$711,000 is for mitigation contracting.

The Site is not on the National Priorities List (NPL). There are no nationally significant or precedent-setting issues associated with the proposed removal action.

CONCURRENCES

Name: Sweet Kleen

Init: sb

Date: 06/01/06

Filename: # 0276

Symbol

Surname

Date

ERRD-RAB	ERRD-RAB	ERRD-RAB	ORC-NYCSUP	ERRD-DD	ERRD-D
Matheis <i>MM</i>	Pane <i>PP</i>	Rotola <i>RR</i>	Lieber	McCabe	Pavlou
6/5/06 <i>MM</i>	6/5/06 <i>PP</i>	6/5/06 <i>RR</i>			



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

ACTION MEMORANDUM

DATE:

SUBJECT: Request for a 12-Month Exemption at the Sweet Kleen Laundry Site,
Buffalo, Erie County, New York

FROM: Kevin M. Matheis, On-Scene Coordinator
Removal Action Branch

MP. Pave for km

TO: George Pavlou, Director
Emergency and Remedial Response Division

THRU: Joe Rotola, Chief
Removal Action Branch

J. Rotola

Site ID#: UQ

I. PURPOSE

The purpose of this Action Memorandum is to request and document approval of a 12-Month Exemption for the ongoing removal action for the Sweet Kleen Laundry Site (Site), located at 760 Kensington Avenue, Buffalo, Erie County, New York, 14215. The proposed project ceiling will remain at \$887,000, of which \$711,000 is for mitigation contracting.

The Site is not on the National Priorities List (NPL). There are no nationally significant or precedent-setting issues associated with the proposed removal action.

II. SITE CONDITIONS AND BACKGROUND

The Comprehensive Environmental Response, Compensation and Liability Information System ID Number for the Site is NYD013771217.

A. Site Description

1. Removal site evaluation (RSE)

The RSE summary is included within the original Action Memorandum which is included as Attachment 1.

2. Physical location

The physical location is included within the original Action Memorandum which is included as Attachment 1.

3. Site characteristics

The site characteristics are included within the original Action Memorandum which is included as Attachment 1.

4. Release or threatened release into the environment of a hazardous substance, or pollutant, or contaminant

The hazardous substances identified by EPA as part of the removal site evaluation (RSE) and information provided by the City of Buffalo included the following hazardous substances, as defined by Section 101(14) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), as amended, 42 U.S.C. 9601 et seq.

Material	Quantity	Storage Method	Primary Hazard	Statutory Source for Designation as a Hazardous Substance
Tetra-chloroethylene contaminated soil	600 tons in soil piles	None.	Toxic	2, 3, 4

Notes: 1 - Clean Water Act (CWA) Section 311(b)(4)
2 - CWA Section 307(a)
3 - CAA Section 112
4 - RCRA Section 3001

The tetrachloroethylene contaminated soils had been excavated from a hot spot identified in EPA-ERTs sampling event at the site in December, 2003. Laboratory analysis of the soil stockpile indicate that tetrachloroethylene is present from 3.9 ppm to 68 ppm. A portion of these soils also failed the Toxicity Characteristic Leaching Procedure test thereby making it a RCRA listed waste.

The ongoing removal action addresses the disposal of hazardous materials from the Site.

5. NPL status

The Site is not listed on the NPL, and there are no efforts underway to include the Site on the NPL.

6. Maps, pictures, and other graphic representations

Within Attachment 1, Figures 1, 2, and 3 are included as Attachment 5 in the original Action Memorandum.

B. Other Actions to Date

1. Previous actions

Prior to EPA's involvement at the Site, there were no significant actions taken by any governmental agency at the Site.

2. Current actions

An Action Memorandum, authorizing funding to undertake this removal action, was signed on April 7, 2005. Field activities began on May 9, 2005. All asbestos has been removed from the site, buildings have been dismantled and sent off-site, waste containers have been removed, the Site has been fenced and soil excavation activities are complete. Upon completion of the soil excavation, bedrock had been encountered. Although analysis had shown that most of the tetrachloroethylene contaminated soil had been removed, EPA installed a passive soil vapor extraction (SVE) system to monitor if vapors are still in the bedrock. This SVE will be monitored by EPA for the next several months prior to turning the site back over to the City of Buffalo. Approximately 600 tons of tetrachloroethylene contaminated soil remain to be sent off-site to complete this action. The 12 month exemption requested in this Action Memorandum is necessary to complete this task.

C. State and Local Authorities' Role

1. State and local actions to date

See original Action Memorandum which is included as Attachment 1.

2. Potential for continued State/local response

There is no potential for the State or local government agencies to address the hazardous substances located at the Site.

III. THREATS TO PUBLIC HEALTH, OR WELFARE, OR THE ENVIRONMENT AND STATUTORY AND REGULATORY AUTHORITIES

A. Threats to Public Health or Welfare

The conditions at the Site meet the criteria for a CERCLA removal action under 40 CFR Part 300.415(b)(2) of the National Contingency Plan. Factors that support conducting a removal action at the Site include:

- (iii) Hazardous substances, or pollutants, or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release;**

The tetrachloroethylene contaminated soils are in covered stockpiles that are not suitable containers for long-term storage. If the tarps tear or leak, tetrachloroethylene may be released from the soil stockpiles and pose a threat of exposure to nearby residents and workers.

- (vii) The availability of other appropriate federal or State response mechanisms to respond to the release.**

No other federal or State response mechanism is available to respond to the significant threat which the Site presents to nearby residents and workers.

B. Threats to the Environment

The conditions at the Site meet the criteria for a CERCLA removal action under 40 CFR Part 300.415(b)(2) of the National Contingency Plan. Factors that support conducting a removal action at the Site include:

- (iii) Hazardous substances, or pollutants, or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release;**

The tetrachloroethylene contaminated soils are in covered stockpiles that are not suitable containers for long-term storage. If the tarps tear or leak, tetrachloroethylene may be released from the soil stockpiles into the environment.

- (vii) The availability of other appropriate federal or State response mechanisms to respond to the release.**

No other federal or State response mechanism is available to respond to the significant threat which the Site presents to the environment.

IV. ENDANGERMENT DETERMINATION

Actual or threatened releases of hazardous substances from the Site, if not addressed by implementing the response action selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, or welfare, or the environment.

V. EXEMPTION FROM STATUTORY LIMITS

A. Emergency Exemption

- 1. There is an immediate risk to public health or welfare or the environment.**

The tetrachloroethylene contaminated soils are stored in a covered stockpile. The laboratory analysis revealed high levels of tetrachloroethylene within the soil stockpile. High levels of volatile organic compounds have been detected within the soil stockpile and present an immediate risk to public health or welfare or the environment.

- 2. Continued response actions are immediately required to prevent, limit, or mitigate an emergency.**

The tetrachloroethylene contaminated soils are in covered stockpiles that are not suitable containers for long-term storage. If the tarps tear or leak, tetrachloroethylene may be released from the soil stockpiles into the environment. Removal of the soil to an off-site disposal facility is required immediately to prevent, limit, or mitigate an emergency at the Site.

- 3. Assistance will not otherwise be provided on a timely basis.**

No other governmental or potentially responsible party can provide assistance to mitigate the public health threats on a timely basis at the Site.

VI. PROPOSED ACTIONS AND ESTIMATED COST

A. Proposed Actions

- 1. Proposed action description**

The following activities are proposed to address the immediate threats to human health and the environment posed by hazardous substances, or pollutants, or contaminants present at the Site.

- a. Disposal - The 600 tons of soil will be disposed. Upon receipt of disposal analysis, waste profiles will be completed and sent to disposal facilities for acceptance. Compatible materials will be sent to off-site disposal facilities in compliance with EPA's Off-Site Disposal Rule.**

2. Contribution to remedial performance

The Site is not presently on the NPL. The response measures proposed in this Action Memorandum will address the threats posed to public health through removal of hazardous substances. The proposed action will contribute effectively to any long-term remedial action with respect to the release or threatened release of hazardous substances at the Site.

3. Description of alternative technologies

Due to the quantities and types of the hazardous substances and/or wastes at the Site, on-site treatment and/or incineration are not appropriate. The selected removal action includes the characterization of hazardous substances found at the Site and the transportation of all hazardous substances off-site for treatment and/or disposal. It is anticipated that the contaminated soils will meet eligibility requirements for landfill disposal, with appropriate treatment as required. The selected removal action has been determined to be the appropriate response action for the Site based upon the criteria of effectiveness, implementability and cost.

4. EE/CA

Due to the time-critical nature of this removal action, an EE/CA will not be prepared.

5. Applicable or Relevant and Appropriate Requirements (ARARS)

ARARS that are within the scope of this removal action will be met to the extent practicable. Federal ARARS determined to be applicable for the proposed scope of work include the Resource Conservation and Recovery Act and the Hazardous Materials Transportation Uniform Safety Act.

6. Project schedule

It is anticipated that the disposal of the contaminated soil will be completed within 6 weeks.

Estimated Costs:

Costs will remain the same as the previous Action Memorandum. No additional costs are required for this 12-Month exemption. Costs are detailed in Attachment 1.

II. EXPECTED CHANGE IN THE SITUATION SHOULD NO ACTION BE TAKEN OR ACTION DELAYED

Should a 12-Month Exemption not be granted, the soil will remain stockpiled and could release tetrachloroethylene into the environment, potentially impacting adjacent commercial and residential areas.

VIII. OUTSTANDING POLICY ISSUES

No known outstanding policy issues are associated with the Site.

IX. ENFORCEMENT

The enforcement section is found within Attachment 1.

IX. RECOMMENDATION

Conditions at the Site meet the criteria for a CERCLA section 104(c) emergency exemption and I recommend that you approve an exemption from the 12 month limit to allow a continued removal response for the Sweet Kleen Laundry Site in the City of Buffalo, New York. This decision document was developed in accordance with CERCLA, as amended, and is consistent with the NCP. This decision is based on the administrative record for the Site. The total project ceiling for this removal action will remain at \$887,000, of which, \$711,000 was for mitigation contracting.

Please indicate your approval, or disapproval, of the 12 month exemption request as per current Delegation of Authority, by signing below.

APPROVAL: _____ **DATE:** _____
George Pavlou, Director
Emergency and Remedial Response Division

DISAPPROVAL: _____ **DATE:** _____
George Pavlou, Director
Emergency and Remedial Response Division

cc: (after approval is obtained)
W. McCabe, ERRD-DD
J. Rotola, ERRD-RAB
M. Pane, ERRD-RAB
N. Magriples, ERRD-RAB
G. Zachos, ACSM/O
J. LaPadula, ERRD-NYRB
T. Lieber, ORC-NYCSUP
P. Brandt, PAD
R. Manna, OPM-FMB

T. Grier, 5202G
P. McKechnie, OIG
A. English, NYSDEC
J. Steger, NOAA
A. Raddant, DOI
L. Battes, NYSEMO
G. Litwin, NYSDOH
C. Kelley, RST

ATTACHMENT 1

Action memorandum Signed April 7, 2005



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

ACTION MEMORANDUM

DATE: APR - 7 2005

SUBJECT: Request for a Removal Action at the Sweet Kleen Laundry Site,
Buffalo, Erie County, New York

FROM: Kevin M. Mathejs, On-Scene Coordinator
Removal Action Branch

TO: William McCabe, Director
Emergency and Remedial Response Division

THRU: Richard C. Salkie, Chief
Removal Action Branch

Site ID#: UQ

I. PURPOSE

The purpose of this Action Memorandum is to request and document approval of the proposed removal action described herein for the Sweet Kleen Laundry Site (Site), located at 760 Kensington Avenue, Buffalo, Erie County, New York, 14215. The proposed project ceiling is \$887,000, of which \$711,000 is for mitigation contracting.

The Site is not on the National Priorities List (NPL). There are no nationally significant or precedent-setting issues associated with the proposed removal action.

II. SITE CONDITIONS AND BACKGROUND

The Comprehensive Environmental Response, Compensation, and Liability Information System ID Number for the Site is NYD013771217.

A. Site Description

1. Removal site evaluation (RSE)

On October 29, 2003, the City of Buffalo requested that EPA evaluate the Sweet Kleen Site and consider the Site for a removal action (see Attachment 1). The City of Buffalo is a U.S. Environmental Protection Agency (EPA) Brownfields grant recipient, and the City made this request for assistance to return the property to productive use. In the referral request, the City of Buffalo provided the EPA with an overview of the building contents, and with results from asbestos samples taken by the City from the Site buildings.

In response to this referral, EPA conducted an expedited removal assessment (ERA) at the Site with EPA's Removal Support Team Contractor (RST), EPA's Environmental Response Team (EPA-ERT), and representatives of the New York State Department of Environmental Conservation (NYSDEC) on December 16 and 17, 2003. Results of this ERA identified the presence of hazardous substances in drums located at the Site, and in soil beneath dry cleaning units within the Site building. In addition, the ERA also documented the presence of asbestos throughout the Site building.

During the ERA, EPA confirmed the presence of the following at the Site: over 100 small containers of paint-related materials and corrosive detergents in the Site offices; nine drums of which two contained tetrachloroethylene; four drums that were inaccessible due to building conditions; over 1,000 linear feet of asbestos piping (approximately 3" to 6" in diameter) in deteriorated condition in collapsed buildings; over 500 cubic yards of asbestos-contaminated materials (ACM) and debris within the collapsed buildings; four electrical transformers containing unknown oil contents; one suspected underground storage tank containing unknown materials; and an estimated 200 cubic yards of tetrachloroethylene, arsenic, and lead contaminated ash in the 100 foot chimney on-Site. EPA also identified an unknown amount of tetrachloroethylene contaminated soils beneath dry cleaning equipment in the Site buildings.

NYSDEC referred the Site to EPA in a letter dated March 15, 2004 (this letter is included in Attachment 1). In the referral, NYSDEC requested that EPA identify and dispose of hazardous wastes at the Site.

2. Physical location

The Site is approximately 1/2-acre in size and is located in a mixed commercial and residential area. Hazardous substances and asbestos are present in the on-Site buildings, which cover most

of the Site property and are interconnected via doorways and supporting structures. These interconnected buildings include dry cleaning and laundry operation areas, boiler and electrical rooms, warehouse space, retail space, and wholesale shipping and receiving areas. The Site also contains a 100-foot brick chimney suspected to have been used for incineration of laundry waste and/or boiler venting, and a 60-foot wood and steel water tower.

The layout of the facility is presented in Figure 2 of Attachment 5. A description of the major areas are presented below:

- Room 1 - Location of dry cleaning operations and access to outdoor drum storage. Approximately 100 linear feet of asbestos insulation falling from pipes. Location of tetrachloroethylene found beneath flooring.
- Room 2 - Corridor connecting pipes between Room 1 and Room 3. Asbestos-coated pipes and pipe insulation on floor. Approximately 100 linear feet of pipe insulation in room.
- Room 3 - Location of laundry machines, electrical transformers, completely collapsed roofing and approximately 400 linear feet of asbestos insulation falling off pipes. Room 3 is adjacent to warehouse space.
- Room 4 - Shipping area containing approximately 300 linear feet of asbestos insulation falling from pipes, roof is partially collapsed and in poor condition.
- Room 5 - Offices containing laboratory chemicals of paints and caustic detergents. Interconnected with site buildings.
- Boiler Room - Boilers and compressors in room adjacent to Room 4. Approximately 100 linear feet of asbestos pipe insulation in poor condition.
- Chimney - 100-foot brick chimney used for boiler room and for possible incineration of laundry scraps and boiler venting. An estimated 100 cubic yards of ash and residue contains tetrachloroethylene, arsenic up to 184 ppm, and lead up to 2,160 ppm.

The Site is bordered by Kensington Avenue to the south, Liberty Avenue to the east, Federal Avenue to west, and residences and businesses adjacent to the Site to the south. Pedestrian traffic is prevalent on the southern boundary of the Site, which is immediately adjacent to Kensington Avenue to the north.

Within a 1/4 mile radius of the Site, over 100 homes are located with an estimated population of 400.

3. Site characteristics

The Site is the location of the former Sweet Kleen Laundry that was in operation from 1925 to 1993, when operations ceased. The laundry was commercial in scale and primarily provided industrial laundering and dry cleaning services. No prior tenants to Sweet Kleen existed at the Site. The City of Buffalo is the current property owner, acquiring the Site in November 2002 through an in rem tax foreclosure. Two adjacent buildings and the real property upon which they

sat were subdivided from the original Site property and sold to a third party prior to the City of Buffalo acquiring the Site property as it is now constituted. At this time, it is undetermined if these buildings were an active part of the dry cleaning operations.

This is the first Action Memorandum for the Site.

4. Release or threatened release into the environment of a hazardous substance, or pollutant or contaminant

The hazardous substances identified by EPA as part of the removal site evaluation (RSE) and information provided by the City of Buffalo included the following hazardous substances, as defined by Section 101(14) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended, 42 U.S.C. §§ 9601 et seq.

Material	Approximate Quantity	Storage Method	Primary Hazard	Statutory Source for Designation as a Hazardous Substance
Lead	~100 y ³ of chimney residue	None	Toxic, Inhalation and ingestion	2
Arsenic	~100 y ³	None	Toxic, inhalation and ingestion	2
Asbestos	~1,000 linear feet and 500 cubic yards of debris	None; Hanging from piping and scattered throughout the building in debris piles	Carcinogen	2, 3
Tetra-chloroethylene	~200 y ³ of chimney residue	None	Toxic	2, 3, 4
Tetra-chloroethylene	2 drums	30 gallon drums	Toxic	2, 3, 4
Flammable Liquids - Paints and solvents, propane cylinders	~50 containers	1 pint - 5 gallon pails	Flammable (D001)	4

Corrosive Detergents and Cleaners	~50 containers	1 pint - 5 gallon pails	Corrosive (D002)	4
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Notes: 1 - Clean Water Act (CWA) Section 311(b)(4)
2 - CWA Section 307(a)
3 - CAA Section 112
4 - RCRA Section 3001

The asbestos in the building is in poor condition and much of it has collapsed onto the floors. Some of the asbestos has been swept into large debris piles and abandoned. Asbestos is designated as a CERCLA hazardous substance under 40 CFR §302.4 when it is friable. Friability is the ease with which a material can be crumbled, pulverized, or reduced to powder, when dry, by hand pressure. The more easily that a material crumbles, the greater the potential for fiber release. Once released, asbestos fibers have the ability to remain airborne air for an extended period of time. Much of the ACM in the buildings on-Site is extremely friable due to its exposure to the elements.

The building's partially collapsed roof and open windows represent mechanisms for release of asbestos fibers into the environment. When ACM is exposed to the elements, the potential for the off-Site migration of asbestos fibers is significantly increased. The potential for future releases can only be exacerbated by further deterioration of the buildings and/or release from the Site by the threat of fire and/or explosion. Results of the asbestos samples are found in Attachment 2.

The small containers of paint-related materials and corrosive cleaners are scattered throughout the facility with the majority of the containers being located in Room 5. Some of the containers have leaked and may be stored adjacent to chemically-incompatible materials.

The UST tank containing unknown materials has not yet been sampled due to inaccessibility of the sampling ports. This tank has an estimated 500-gallon capacity and may contain waste or product from Site operations.

Four electrical transformers are situated on the roof above Room 3. The electrical transformers were inaccessible for sampling or label identification due to the poor condition of the roof and the collapsed portions of the Site buildings. Further building collapse may cause these transformers to release their contents. Aerial observations from a boom lift have shown that two of the four electrical transformers have had the lids removed in an apparent attempt to scavenge the metal from the transformers. It is unknown at this time if the transformer oil had spilled into the floor of Room 3. As part of this Action Memorandum, the transformers will be tested and removed from the Site. If they contain polychlorinated biphenyls (PCBs), soil sampling will be required in the area where the transformers were scavenged to determine if soil contamination exists.

The two drums containing tetrachloroethylene are in poor condition and are stored outside adjacent to Room 1. These drums may release their contents into the ground if not removed. Two additional drums are located within the collapse room debris of Room 3. These drums will require testing and removal once the building debris has been removed. Other drums tested by EPA will be resampled since they were partially frozen during the RSE in December 2003. Four additional drums were inaccessible due to their location within the collapsed building. Results of the RST drum sampling are found in Attachment 4.

ERT performed a soil/gas survey at the Site and detected tetrachloroethylene in Room 1, Room 3, and in front of the Site buildings along Kensington Avenue. Soil samples were obtained via geoprobe in areas where tetrachloroethylene soil gas was detected. Results of the sampling indicate that tetrachloroethylene has contaminated soils beneath Room 1. Two samples collected from this location identified tetrachloroethylene at 8,600 ppm and 5,300 ppm.

A 100-foot brick chimney used for boiler venting and possible incineration of laundry scraps contains approximately 200 cubic yards of ash and soot. Samples of the ash and soot contain up to 184 ppm total arsenic and 2,160 ppm for total lead. The chimney is in deteriorated condition and threatens to collapse. Soot and ash from an uncontrolled collapse may cause the hazardous substances to be spread. Sampling results by RST are found in Attachment 4.

This removal action addresses the disposal of hazardous materials from the Site.

5. NPL status

The Site is not listed on the NPL, and there are no efforts underway to include the Site on the NPL.

6. Maps, pictures, and other graphic representations

Figures 1, 2, and 3 are included as Attachment 5 and provide the location and configuration of the Site. Photographs of the Site building layout and roof conditions are included as Photos 1 through 4 in Attachment 5.

B. Other Actions to Date

1. Previous actions

Prior to EPA's involvement at the Site, there were no significant actions taken by any governmental agency at the Site.

2. Current actions

The Site is an idle, abandoned property in proximity to a brownfields development project being implemented by the City. The City of Buffalo acquired the Site through tax foreclosure, and collected samples from suspected asbestos within the Site buildings. On October 29, 2003, the City of Buffalo requested that EPA evaluate the Sweet Kleen Site and consider the Site for a removal action. As a result of this referral request, on December 16 and 17, 2003, EPA conducted an ERA at the Site with EPA's RST Contractor, EPA-ERT, and representatives of NYSDEC.

Results of this ERA identified the presence of hazardous substances in drums and other containers located at the Site and in soil beneath dry cleaning units within the Site buildings. The ERA also documented the presence of asbestos throughout the Site buildings.

C. State and Local Authorities' Role

1. State and local actions to date

No NYSDEC actions have occurred to date at the Site. At the request of EPA, the Buffalo Sewer Authority investigated and sampled the three sewer out-falls associated with the Site. One of the sewer samples detected tetrachloroethylene at concentration of 5.4 ppb, which is slightly above the levels that are safe for potable consumption established by the Federal drinking water standards. As a result, it appears that the tetrachloroethylene contamination beneath Room 1 may be migrating to the sewer system connected to the Site.

2. Potential for continued State/local response

There are no actions being taken by State or local government agencies to address the hazardous substances located at the Site.

III. THREATS TO PUBLIC HEALTH, OR WELFARE, OR THE ENVIRONMENT AND STATUTORY AND REGULATORY AUTHORITIES

A. Threats to Public Health or Welfare

The conditions at the Site meet the criteria for a CERCLA removal action under 40 CFR Part 300.415(b)(2) of the National Contingency Plan. Factors that support conducting a removal action at the Site include:

- (i) Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances, or pollutants, or contaminants;

The Site is temporarily secured, but has been the subject of frequent break-ins and vandalism.

Evidence of the presence of vagrants and homeless persons is evident in the Site buildings. The containers of hazardous substances and asbestos in the buildings present a threat to public health and welfare. Releases from asbestos, drums, and laboratory containers have occurred and continue to occur at the Site.

Portions of the roof have collapsed onto asbestos-insulated pipes. Further roof collapse in the other buildings may cause asbestos to be released.

Portions of the chimney on-Site are in poor condition and a partial collapse of the chimney may occur. Ash and residue from the chimney may be released into the environment if this were to occur.

During the RSE, it was observed that the buildings were poorly secured and had been vandalized.

- (iii) Hazardous substances, or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release;**

The drums, tank, and other containers found at the Site contain the hazardous substances as listed in Section II.A.4 of this Action Memorandum. The hazardous substances within these containers present a threat of continuing release.

- (v) Weather conditions that may cause hazardous substances, pollutants or contaminants to migrate or be released;**

Several of the roofs in the Site buildings have collapsed. Other portions of roofs are in poor condition. Snow melt and rainfall contribute to the decay of the building structure and may have caused the roof to collapse, causing further deterioration to the asbestos and containers of hazardous substances.

- (vi) Threat of fire or explosion; and**

The Site contains approximately 50 containers of various sizes containing paints, thinners, and propane gases that are flammable. Some of the containers are in poor condition and are leaking. In addition to releases from hazardous substances in a fire, asbestos fibers would also be released from the Site.

- (vii) The availability of other appropriate Federal or State response mechanisms to respond to the release.**

No other Federal or State response mechanism is available to respond to the significant threat which the Site presents.

B. Threats to the Environment

The conditions at the Site meet the criteria for a CERCLA removal action under 40 CFR Part 300.415(b)(2) of the National Contingency Plan. Factors that support conducting a removal action at the Site include:

- (i) **Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances, or pollutants or contaminants;**

The Site is temporarily secured, but has been the subject of frequent break-ins and vandalism. Evidence of the presence of vagrants and homeless persons is evident in the Site buildings. The containers of hazardous substances and asbestos in the buildings present a threat to public health and welfare. Releases from asbestos, drums, and laboratory containers have occurred and continue to occur at the Site.

Portions of one of the roofs have collapsed onto asbestos pipes. Further roof collapse in the other buildings may cause asbestos to be released.

Portions of the chimney on-Site are in poor condition and a partial collapse of the chimney may occur. Ash and residue from the chimney may be released into the environment if this were to occur.

During the RSE, it was observed that the buildings were poorly secured and had been vandalized.

- (v) **Weather conditions that may cause hazardous substances, pollutants or contaminants to migrate or be released; and**

Several of the roofs in the Site buildings have collapsed. Other portions of roofs are in poor condition. Snow melt and rainfall contribute to the decay of the building structure and may have caused the roof to collapse, causing further deterioration to the asbestos and containers of hazardous substances.

IV. ENDANGERMENT DETERMINATION

Actual or threatened releases of hazardous substances from the Site, if not addressed by implementing the response action selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, or welfare, or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COST

A. Proposed Actions

1. Proposed action description

The following activities are proposed to address the immediate threats to human health and the environment posed by hazardous substances, or pollutants, or contaminants present at the Site.

- a. Stabilization - All containers that are open or of questionable integrity will be over-packed or transferred into new containers. Containers will be placed in compatible waste groups and removed from areas containing asbestos.
- b. Sampling - All containers, transformers, and the underground storage tank (UST) will be sampled for disposal analysis parameters. Where possible, composite samples will be taken to reduce the total amount of samples analyzed. Areas of asbestos contamination will be sampled to confirm and/or delineate the presence of asbestos in Site debris.
- c. Analysis - All samples will be evaluated for compatibility. The samples will be analyzed for disposal parameters, anticipated to be the full TCLP analysis.
- d. Disposal - Upon receipt of disposal analysis, waste profiles will be completed and sent to disposal facilities for acceptance. Compatible materials will be sent to off-Site disposal facilities in compliance with EPA's Off-Site Disposal Rule.
- e. Asbestos Abatement - Some of the areas at the Site which contain drums and other containers of hazardous substances are also highly contaminated by asbestos. During the stabilization and sampling phase, areas that contain the greatest concentrations of asbestos will be addressed prior to demolition actions. An asbestos abatement contractor will abate the asbestos from these areas. Once these areas are abated, workers will proceed with hazardous substance stabilization, sampling, and disposal.
- f. Demolition of Site buildings - The Site buildings are interconnected and are in a severe state of deterioration. The collapsed building sections have mixed with asbestos from pipe insulation and have created ACM debris. The ACM debris is situated in collapsed building sections and requires removal. This can only be accomplished by building demolition.

Stone and steel from the building demolition will be recycled and wood will be sent off-Site for landfill. ACM debris will also be sent off-Site for landfill. In addition, demolition of Site buildings are required to further assess soil contamination beneath Room 1.

- g. Assessment of Soil Contamination - Once the buildings are removed, EPA will assess the extent and concentrations of soil contamination beneath Room 1 and adjacent rooms and in areas where additional soil contamination may exist. These areas may include the scavenged transformer area and the UST. Contaminated soils that present a health threat will be addressed.

2. Contribution to remedial performance

The Site is not presently on the NPL. The response measures proposed in this Action Memorandum will address the threats posed to public health through removal of hazardous substances. The proposed action will contribute effectively to any long-term remedial action with respect to the release or threatened release of hazardous substances at the Site.

3. Description of alternative technologies

Because of the quantities and types of the hazardous substances and/or wastes at the Site, on-Site treatment and/or incineration is not appropriate. The selected removal action includes the characterization of hazardous substances found at the Site and the transportation of all hazardous substances off-Site for treatment and/or disposal. It is anticipated that the contaminated soils will meet eligibility requirements for landfill disposal, with appropriate treatment as required. The selected removal action has been determined to be the appropriate response action for the Site based upon the criteria of effectiveness, implement ability, and cost.

4. EE/CA

Due to the time-critical nature of this removal action, an EE/CA will not be prepared.

5. Applicable or Relevant and Appropriate Requirements (ARARS)

ARARS that are within the scope of this removal action will be met to the extent practicable. Federal ARARS determined to be applicable for the proposed scope of work include the Resource Conservation and Recovery Act and the Hazardous Materials Transportation Uniform Safety Act.

6. Project schedule

It is anticipated that the project will be completed within four months. Four phases will be implemented, each taking different time-frames to complete. Phase one will be mobilization to the Site with consolidation, stabilization, sampling, and disposal of drums, tanks, and containers of hazardous substances. Phase two will be the asbestos abatement of the Site buildings that are structurally sound. Phase three will be the demolition of on-Site buildings and removal of ACM debris and previously inaccessible drums and transformers. Phase four will be the sampling and

analysis of soil from under the Site buildings, and the subsequent removal of soil that meets removal action criteria.

Estimated Costs:

The estimated costs for the completion of this project are summarized below. Detailed costs are included as Attachment 6.

Extramural Costs:

Regional Allowance Costs:

ERRS Cost	\$ 616,000
15% contingency	\$ 93,000
Total ERRS Cost	\$ 711,000

Other Extramural Costs Not Funded From the Regional Allowance:

Total RST costs	\$ 60,000
SUBTOTAL, EXTRAMURAL COSTS	\$ 771,000
Extramural Cost Contingency (15%)	\$ 116,000
TOTAL EXTRAMURAL COSTS	\$ 887,000
TOTAL, REMOVAL PROJECT CEILING	\$ 887,000

VI. EXPECTED CHANGE IN THE SITUATION SHOULD NO ACTION BE TAKEN OR ACTION DELAYED

Should no action be taken or the planned action be delayed, hazardous substances such as asbestos in Site buildings, and hazardous substances contained in drums, lab chemicals, sub-slab soils, and the UST could be released. A release of hazardous substances from the Site could result in the exposure of the neighboring population and/or contamination of the environment. Releases of contaminants to the air and additional soil contamination could increase the cost of the required removal action.

VII. OUTSTANDING POLICY ISSUES

No known outstanding policy issues are associated with the Site.

VIII. ENFORCEMENT

As appropriate, cost recovery will be sought from viable potentially responsible parties (PRPs), if any, with the support of the Office of Regional Counsel and the Removal Action Branch. It appears that Sweet Kleen Laundry is the PRP for the Site. Due to the lack of a viable PRP at this time and the condition of the Site buildings, EPA will continue the Site work funded by the Superfund.

Enforcement Cost Estimate

Based on full cost accounting practices, the total EPA costs for this removal action that will be eligible for cost recovery are estimated to be \$1,280,000, as follows:

EPA's Total Estimated Project-Related Costs

$\$887,000$ (direct extramural costs) + $\$100,000$ (direct intramural costs) = $\$987,000$
 30.30% (Region-specific Indirect Cost Rate) x $\$987,000$ = $\$299,000$ (rounded indirect costs)

$\$987,000 + \$299,000 = \$1,286,000$ (Estimated EPA Costs for Removal Action)

Note: Direct costs include direct extramural costs and direct intramural costs. Indirect costs are calculated based on an estimated indirect cost rate expressed as a percentage of Site-specific direct costs, consistent with the full cost accounting methodology effective October 2, 2000. These estimates do not include pre-judgment interest, do not take into account other enforcement costs, including Department of Justice costs, and may be adjusted during the course of a removal action. The estimates are for illustrative purposes only and their use is not intended to create any rights for responsible parties. Neither the lack of a total cost estimate nor deviation of actual costs from this estimate will affect the United States' right to cost recovery.

IX. RECOMMENDATION

This decision document represents the selected removal action for the Sweet Kleen Laundry Site in the City of Buffalo, New York, developed in accordance with CERCLA, as amended, and is consistent with the NCP. This decision is based on the administrative record for the Site.

Conditions at the Site meet the NCP Section 300.415(b)(2) criteria for a removal action and is recommended for your approval of the proposed removal action. The total project ceiling for this removal action, if approved, will be \$887,000. Of this, an estimated amount of \$711,000 will come from the FY-04 Regional Advice of Allowance for mitigation contracting.

Please indicate your approval, or disapproval, and authorization of funding as per current Delegation of Authority, by signing below.

APPROVAL:



DATE:

4/7/05

William McCabe, Acting Director
Emergency and Remedial Response Division

DISAPPROVAL:

DATE:

William McCabe, Acting Director
Emergency and Remedial Response Division

cc: (after approval is obtained)

W. McCabe, ERRD-AD
R. Basso, ERRD-ADD
R. Salkie, ERRD-RAB
J. Rotola, ERRD-RAB
J. Witkowski, ERRD-RAB
G. Zachos, ACSM/O
J. LaPadula, ERRD-NYRB
P. Simon, ORC-NYCSUP
P. Brandt, PAD
R. Manna, OPM-FMB
T. Grier, 5202G
P. McKechnie, OIG
R. Marino, NYSDEC
J. Steger, NOAA
A. Raddant, DOI
L. Battes, NYSEMO
G. Litwin, NYSDOH
C. Kelley, RST

Attachment 1

Site Referrals



City of Buffalo

OFFICE OF STRATEGIC PLANNING
Anthony M. Masiello, *Mayor*

October 29, 2003

Mr. Kevin M. Matheis
On-Scene Coordinator
U.S. EPA Region II
Removal Action Branch
111 West Huron, Room 1114
Buffalo, New York 14202

Re: 764 Kensington Avenue

Dear Mr. Matheis:

As a recipient of a U.S. EPA Brownfield Pilot Grant the City of Buffalo is requesting U.S. EPA assistance in mitigating a potentially unsafe condition at a former wholesale laundry cleaning business (Sweet Kleen Laundry) located at 764 Kensington Avenue in the City of Buffalo. The City acquired the premises through the In Rem process due to tax delinquency in November 2002 (see attached Foreclosure and Title Search)

An inspection of the property, conducted by City inspectors, indicated the presence of numerous containers of unknown materials left on the property and the potential presence of an underground storage tank. The attached photographs show that some containers appear to be in poor condition, necessitating an expedient removal to prevent an unplanned release.

The inspection also indicated the presence of potential asbestos containing building materials (ACBM) and an underground storage tank on-site. Several samples of the suspected ACBM were collected and analyzed (see attached results).

I look forward to discussing potential plans for a response to the above matter and working with the EPA to safely and efficiently bring this brownfield into productive use. Please contact me if you have any questions regarding the above.

Sincerely,
OFFICE OF STRATEGIC PLANNING

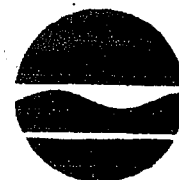
Dennis Sutton, P.G., C.P.G.
Environmental Project Manager

**New York State Department of Environmental Conservation
Division of Environmental Remediation, 12th Floor**

625 Broadway, Albany, New York 12233-7020

Phone: (518) 402-9543 • FAX: (518) 402-9595

Website: www.dec.state.ny.us



Erin M. Crotty
Commissioner

March 15, 2004

Mr. George Pavlou
Director
Emergency & Remedial Response Division
USEPA, Region II
290 Broadway
New York, New York 10007-1866

RE: Former Sweet Kleen Laundry Facility
764 Kensington Avenue (at Liberty Avenue)
Buffalo (C), Erie County

Dear Mr. Pavlou:

The New York State Department of Environmental Conservation (NYSDEC) hereby requests the United States Environmental Protection Agency (USEPA) perform an appropriate CERCLA emergency response action at the former Sweet Kleen Laundry facility located at 746 Kensington Avenue in the City of Buffalo.

On November 5, 2003, the USEPA was asked by the City of Buffalo to inspect the site for environmental hazards which were left behind in the abandoned structures that comprise the facility. The NYSDCE attended this inspection to verify if hazardous waste disposal issues were present at the site. Based upon this inspection, the USEPA returned to the site in December, 2003, and performed preliminary sampling of abandoned drums and pails, C+D material, and subsurface samples.

The site buildings are in substantial disrepair with many physical hazards present including, but not limited to, a major roof collapse and documented asbestos. The building is only secured to a limited extent and trespassing is evident. Residential and business properties are immediately adjacent to the facility to the west, north, and east. A local business has purchased a former portion of the Sweet Kleen property on Liberty Avenue immediately adjacent (east) to the Dry-Cleaning room.

Over 100 drums, pails, and containers of hazardous and non-hazardous wastes, and unknown materials, are spread throughout the site. The former dry-cleaning room still has laundry tumblers in place with all supply lines and fixtures still attached. The analytical report for soils, and one groundwater sample, taken from direct-push soil boring samples in the vicinity of the Dry-Cleaning room have documented the spillage of dry-cleaning solvents (eg: tetrachloroethene at 5,300,000 ug/kg / 16,000 ug/l; trichloroethene at 16,000 ug/kg / 45,000 ug/l, etc.) which likely exceed the Toxicity Characteristic

for Hazardous Waste. Four large transformers (two appear to have been drained and stripped of copper) are located on a roof with limited access. A pile of incinerator ash material with reported elevated lead contamination (860 mg/kg total lead) is outside of the building near an old brick stack on the site's west side. An underground storage tank is suspected to exist at the northwest corner of the site.

Due to

the documented waste abandonment and spillage, the possibility that contaminant migration may proceed off-site, and the site's proximity to residential and business properties, a timely removal action and assessment is necessary. USEPA emergency response action is needed to identify and dispose of hazardous wastes and to determine what, if any, impacts to soil and groundwater have occurred as a result of spillage. Such action is necessary to preclude future and potentially greater releases threatening the community and the environment.

If you have any questions regarding this request, please contact Mr. Martin Doster, of the Buffalo Regional staff at (716) 851-7220.

Sincerely,

Robert L. Marino

Robert L. Marino
Director
Bureau of Technical Support

cc: B. Sprague - USEPA, Region II, Edison, NJ
G. Zachos - USEPA, Region II, Edison, NJ
R. Salkie - USEPA, Region II, Edison, NJ
K. Matheis - USEPA, Region II, Edison, NJ

Attachment 2

RST Asbestos Sampling Results

**RST Sampling
Asbestos Sample Results**

Table 2
BULK/DEBRIS SAMPLE DESCRIPTIONS
SWEET KLEEN LAUNDRY SITE
BUFFALO, NEW YORK

Sample Number	Date	Time	Description	Analysis
SKL-A-R1-01	12/16/03	1650	Bulk sample from the floor debris in Room 1	Polarized Light Microscopy (PLM), if negative then, Transmission Electron Microscopy (TEM)
SKL-A-R1-02	12/16/03	1630	Bulk sample from the floor debris in Room 1	Polarized Light Microscopy (PLM), if negative then, Transmission Electron Microscopy (TEM)
SKL-A-R2-01	12/16/03	1625	Bulk sample from the pipe insulation over the heater in Room 2	Polarized Light Microscopy (PLM), if negative then, Transmission Electron Microscopy (TEM)
SKL-A-R3-01	12/16/03	1620	Floor debris fill sample, collected by the door in Room 3	Polarized Light Microscopy (PLM), if negative then, Transmission Electron Microscopy (TEM)
SKL-A-R4-01	12/17/03	1130	Bulk sample from the floor under a wrapped pipe collected in Room 4	Polarized Light Microscopy (PLM), if negative then, Transmission Electron Microscopy (TEM)
SKL-A-R5-01	12/16/03	1620	Floor debris fill sample, collected in Room 5	Polarized Light Microscopy (PLM), if negative then, Transmission Electron Microscopy (TEM)

12/23/03

**DataChem Laboratories
Polarized Light Microscopy
Asbestos Analytical Report**

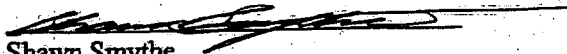
Client: Weston Solutions, Inc.
Location: Not Available
Set ID: 03-A-6203

Client Sample ID:	SKL-A-R1-1	SKL-A-R1-2	SKL-A-R2-1	SKL-A-R3-1	SKL-A-R4-1
DCL Sample ID:	03-36660	03-36661	03-36662	03-36663	03-36664
Macroscopic Examination					
Accepted/Rejected:	Accepted	Accepted	Accepted	Accepted	Accepted
Homogeneity:	Homog.	Layered Inseparable	Homog.	Homog.	Homog.
Color:	Grey	Grey/Green	Grey	Grey	Grey
Texture:	Crmby/Fbrs	Crmby/Fbrs	Fibrous	Crmby/Fbrs	Crmby/Fbrs
Description:	Material	Material	Material	Material	Material
Analysis:	PLM	PLM	PLM	PLM	PLM
Asbestiform Minerals					
% Chrysotile:	>20≤30	>5≤10	>30≤40	>20≤30	>20≤30
% Amosite:	>3≤5	>1≤3			
% Crocidolite:					
% Tremolite - Actinolite:					
% Anthophyllite:					
% Total Asbestos:	>23≤35	>6≤13	>30≤40	>20≤30	>20≤30
Other Materials					
% Cellulose:		>10≤20	>40≤50		
% Fiberglass:					
% Other Fibers:					
% Resin/Binder:		>20≤30			
% Non Fibrous:	>60≤70	>30≤40	>5≤10	>60≤70	>60≤70

ND = None Detected Trace = <1%

Special Prep Procedures: None.

*Notes: P. O. #: 0042073.


Shawn Smythe
Microscopist

All values are in area percent by visual estimate. The Federal Register Vol. 55 No. 224 Tuesday Nov. 20 1990 Rules and Regulations states "... If the asbestos content is estimated to be less than 10% by a method other than point counting, ... (the analysis) be repeated using the point counting technique by PLM." Any of the above samples can be reanalyzed by point counting at the client's request. Wherever possible, separate phases are analyzed and reported individually.



**DATA
CHEM**
LABORATORIES, INC.

12/23/03
Page 1 of 3

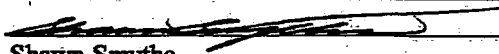
SUBMITTED TO:


Smita Sumbaly
Weston Solutions, Inc.
1090 King Georges Post Road; Suite 201
Edison, NJ 08837

REFERENCE DATA:

Client Sample No.:	SKL-A-R1-1 through SKL-A-R5-1
P.O. No.:	0042073
Sample Location:	Not Available
Sample Type:	Bulk
Method Reference:	EPA-600/R-93/116
DCL Set ID No.:	03-A-6203
DCL Sample ID No.:	03-36660 through 03-36665
Sample Receipt Date:	12/19/03
Analysis Date:	12/23/03

We certify that the following samples were prepared and analyzed by Polarized Light Microscopy for asbestos and other fibrous constituents using EPA-600/R-93/116. The samples were acceptable upon receipt except where noted. The samples were examined under a stereomicroscope in a laboratory fume hood for general composition and phase separation. If needed, portions of the sample were removed and ground with a mortar and pestle before being mounted on a glass microscope slide. Mountings of representative portions of the material are prepared in one or more appropriate refractive index liquids (1.550, 1.605, 1.680) and examined by Polarized Light Microscopy*. Estimates of concentration are made on an area basis. The results of the analysis apply only to the materials analyzed and are summarized on the attached bulk asbestos analysis data sheets. DataChem Laboratories will dispose of all bulk samples after 60 days unless other arrangements are made.


Shawn Smythe
Analyst


Anna Marie Ristich
Reviewer

*Floor tiles, decorative paints, joint compounds, and cement materials require additional treatment in order to evaluate the concentration of small asbestos fibers bound in the material. Some samples may contain fibers that are not visible by PLM and can only be detected by electron microscopy techniques. Floor tiles are analyzed as homogeneous materials if insufficient mastic is present or if phases have been cross contaminated.

DataChem Laboratories NVLAP Lab ID: 101917. Laboratory accreditation by the National Institute of Standards and Technology does not in any way constitute approval or endorsement by NIST.

CINCINNATI OFFICE
4388 GLENDALE-MILFORD ROAD
CINCINNATI, OHIO 45242-3706
513 733-5336, FAX 513 733-5347

WEST COAST OFFICE
11 SANTA YORMA COURT
NOVATO, CALIFORNIA 94945
800 280-8071, FAX 415 883-9489

CHAIN OF CUSTODY RECORD

RFP No.: 42576 per Aaron Levy
 PO No.: 0042073



Removal Support Team
 EPA Contract 68-W-00-113
 Phone: (732) 225-6116 Fax: (732) 225-7037

Matrix Box No.:	Preservative Box No.:
1. Surface	1. HCL
2. Ground water	2. HNO ₃
3. Leachate	3. Na ₂ SO ₄
4. Rinse	4. H ₂ SO ₄
5. Soil/Sediment	5 Other (specify)
6. Oil	6. Ice Only
7. Waste	N. Not preserved
8. Other (Specify)	*See Comments

03-AT-6203

Send verbal and written results to:

Weston Solutions, Inc.
 Suite 201, 1090 King Georges Post Road, Edison, New Jersey, 08837
 Attention: Smita Sumbaly, RST Analytical Coordinator

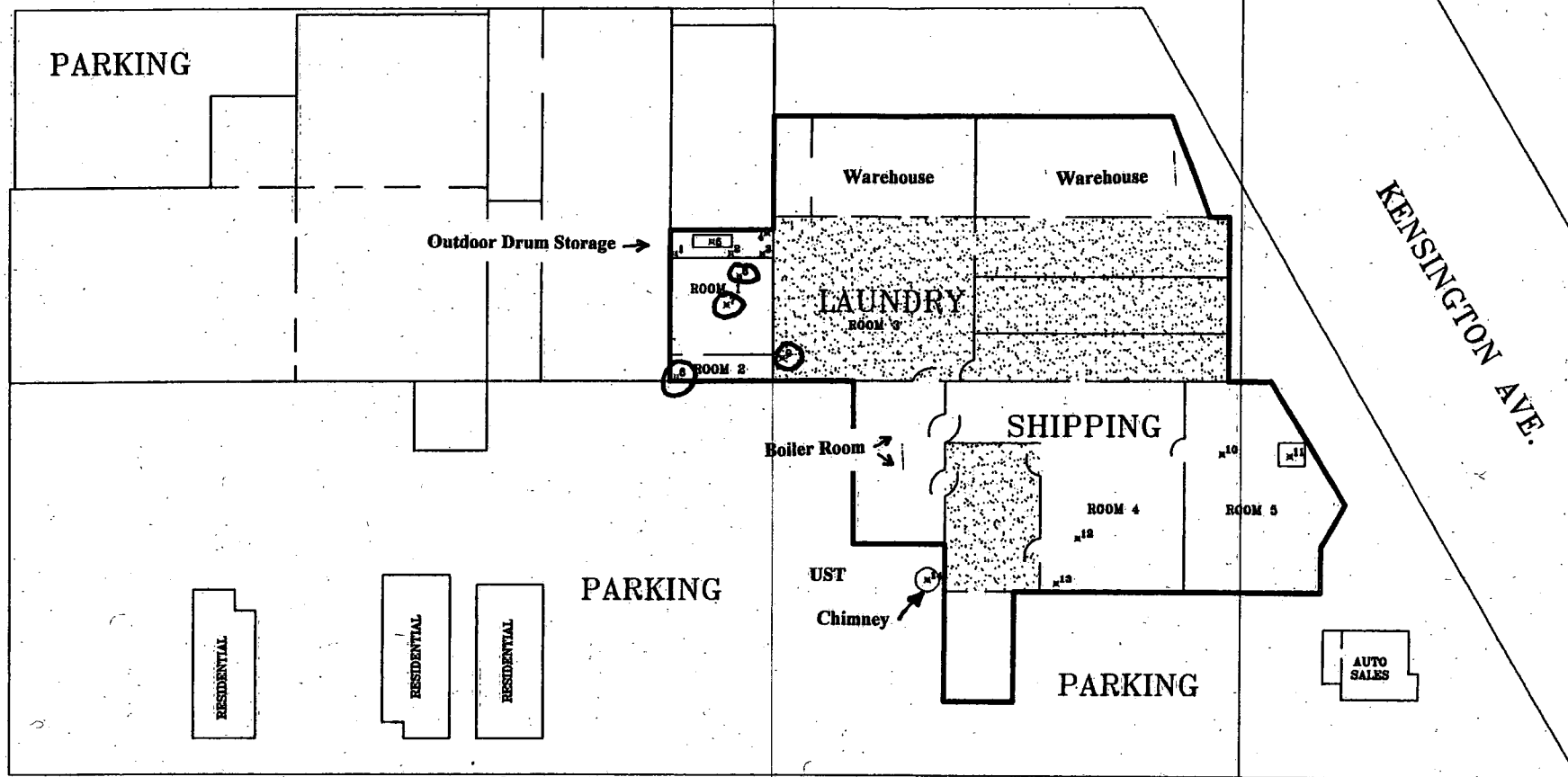
							RAS ANALYSIS					RCRA ANALYSIS				
Sample Number	Sample Collection Method/Time	Sample Matrix (Enter Box 1)	Cont. Low-L Med-M High-H	Sample Type Comp-C Grab-G	Sample Primary, Enter box (2)	03-	VOL	SMA	PEST	PCB	TAL	CH	ION	DOR	REAC	OTHER
SKL-A-R1-1	11/14/03, 1630	*	H	G	-		36660									PLM
SKL-A-R1-2	12/14/03, 180	*	H	G	-		36661									PLM
SKL-A-R2-1	11/14/03, 1635	*	H	G	-		36662									PLM
SKL-A-R3-1	12/14/03, 1620	*	H	G	-		36663									PLM
SKL-A-R4-1	12/17/03, 1130	*	H	G	-		36664									PLM
SKL-A-R5-1	12/12/03, 1125	*	H	G	-		36665									PLM

Comments: * Asbestos - Run PLM + wait for instructions to run TEM - send result of PLM to

Person Assuming Responsibility for Samples: Weston Solutions Aaron Levy						Time/Date
Sample Number	Relinquished By:	Time	Date	Received By:	Reason for Change of Custody	
ALL	[Signature]	1505	12/18/03	FedEx	Shipment to Lab	
Sample Number	Relinquished By:	Time	Date	Received By:	Reason for Change of Custody	
					12/18/03 1123	
Sample Number	Relinquished By:	Time	Date	Received By:	Reason for Change of Custody	

Weston Solutions, Inc.
 FEDERAL PROGRAMS DIVISION
 In Association with Scientific and Environmental Associates, Inc., Resource Applications, Inc., and Innovative Technical Solutions, Inc.

LIBERTY AVE.



FEDERAL AVE.

Asbestos Samples

SAMPLE LOCATIONS

M1 = SKL-BB-01	M5 = SUMP SAMPLE LOCATIONS	M6 = SKL-A-21-01	M10 = SKL-A-25-01	M12 = SKL-A-24-01
M2 = SKL-BB-02	SKL-S-01	M7 = SKL-A-21-02	M11 = SKL-A-25-02	M13 = SKL-T-01
M3 = SKL-BB-03	SKL-S-02	M8 = SKL-A-22-01	M12 = SKL-A-25-01	M14 = SKL-C-01
M4 = SKL-BB-04	SKL-S-03	M9 = SKL-A-22-02	M13 = SKL-A-25-02	

*NOTE: Information only based on areas accessible to RST personnel.

LEGEND

COLLAPSED ROOF



Weston Solutions Inc.
FEDERAL PROGRAMS DIVISION

IN ASSOCIATION WITH SCIENTIFIC ENVIRONMENTAL ASSOCIATES, INC.
RESOURCE APPLICATIONS, INC.
AND INNOVATIVE TECHNOLOGICAL SOLUTIONS INC.

**FIGURE 2
SAMPLE LOCATION MAP
SWEET KLEEN LAUNDRY
BUFFALO, NY**

US ENVIRONMENTAL PROTECTION AGENCY
REMOVAL SUPPORT TEAM
CONTRACT # 68-W-00-113

EDITED BY: W. HENSCHER

EPA OSC: K. MATHEIS

SITE PROJECT MANAGER: A. LEVY

FILE: D:\DMS\SWEETKLEEN

Attachment 3

ERT Sampling Results

ERT Sample Results

Lockheed Martin Technology Services
Environmental Services REAC
2890 Woodbridge Avenue Building 209 Annex
Edison, NJ 08837-3679
Telephone 732-321-4200 Facsimile 732-494-4021

LOCKHEED MARTIN 

DATE: January 28, 2004
TO: Phillip Campagna, U.S. EPA/ERTC Work Assignment Manager
THROUGH: Gary Newhart, REAC Operations Section Leader *Gary Newhart*
FROM: Tim Macaluso, REAC Task Leader
SUBJECT: SITE ASSESSMENT AT THE SWEET KLEEN SITE
WORK ASSIGNMENT R1A00341 - TRIP REPORT

BACKGROUND

The Sweet Kleen Site (Site) is a former commercial dry cleaner located at 760 Kensington Avenue in Buffalo, New York (NY) (Figure 1). The Site is located within the Onondaga Formation, a monoclinic limestone formation containing thin bedded shale and medium bedded limestone. The dry cleaners operated from 1925 to approximately 1990 when operations ceased. The Site consists of several buildings that are in poor condition, from which power and utilities have been disconnected. The main building contains two commercial dry cleaning units that have used tetrachloroethene, also known as perchloroethylene (PCE). It is assumed that the soil beneath the concrete floor slab of the building may be contaminated with PCE, and PCE breakdown products such as *cis* and *trans*-1,2-dichloroethene (DCE), trichloroethene (TCE), vinyl chloride and other Volatile Organic Compounds (VOCs).

The United States Environmental Protection Agency (U.S. EPA)/Environmental Response Team Center (ERTC) Work Assignment Manager (WAM) tasked Lockheed Martin personnel under the Response Engineering and Analytical Contract (REAC) to provide on-site support to the U.S. EPA Region II On Scene Coordinator (OSC) in conducting an extent of contamination study. This support included subcontractor oversight during the collection of various environmental samples from 18 soil boring locations to determine the type and extent of contamination at the Site. A Hapsite™ field portable gas chromatography/mass spectrometer (GC/MS) was used to perform on-site soil gas VOC screening to determine which soil samples were to be sent to the REAC Laboratory in Edison, New Jersey (NJ) for confirmatory VOC analysis.

OBSERVATIONS AND ACTIVITIES

On December 4, 2003, REAC personnel met with the Site OSC to conduct an initial site walk through to determine access to buildings for drilling activities and to collect site maps and miscellaneous information for sampling activities.

During December 15 through 18, 2003, REAC personnel mobilized to the Site to oversee the collection of environmental samples both inside and outside of the main building (Figure 2). A total of 18 soil borings were advanced with an average depth of three feet below ground surface (bgs) and a range of one to six feet bgs. A photo-ionization detector (PID) was used to screen each bore hole for VOCs, the readings were recorded and are presented in Table 1.

A Geoprobe® (direct-push technology unit) drilling system was used to advance the soil borings outside the main building (SB-1 to SB-13). The borings were located between the building and the street, and spaced approximately 50 feet apart. Inside the building soil boring locations (SB-14 to SB-18) were selected due to the proximity to the commercial dry cleaning machines and also by ease of access, as some parts of the building's roof have collapsed making areas inaccessible. A diamond bit corer was used to cut a hole through the concrete floor where a soil boring was to be advanced in the building.

To collect soil gas samples, a clean, expendable drive point adapter was driven to refusal. The drive rod was then retracted four to six inches to create a void which allowed the migration of soil gas into the vacant space of the rod. Dedicated Teflon® tubing was then inserted to the bottom of the rod and soil gas was drawn into a dedicated Tedlar® bag by use of a vacuum box and pump, for VOC analysis by the Hapsite GC/MS.

Where the Geoprobe was used to advance the soil borings, soil samples were collected directly from acetate sleeves. Soil samples inside the building were collected using a hand auger. Soil samples to be analyzed at the REAC Laboratory for VOCs were selected based on Hapsite screening data of soil gas. Analyses were performed specifically to identify PCE and its breakdown products. Table 1 summarizes the sample identification, sample locations, coring depths, collection mode, PID readings, PCE concentrations from the Hapsite and sample matrix. During the advancement of the soil borings, the lithology of each soil boring was observed and documented in the site specific logbook.

One temporary monitoring well was installed (location SB-4) but did not produce a sufficient volume of groundwater to collect a sample and was removed. At location SB-17, a groundwater sample was collected instead of soil gas sample because groundwater was drawn into the vacuum box. At three soil bore hole locations (SB-14, SB-15 and SB-18), a soil gas sample and a head space sample from the gravel layer between the concrete pad and the clay soil were collected to determine if there was any correlation between the data. No correlation was evident. (The head-space sample is denoted with a subscript s, i.e., SB-14s.) This did not affect the soil analysis since only one soil sample per soil boring was collected.

Copies of the REAC field logbook pages documenting field activities and observations are in Appendix B, along with copies of the drilling subcontractor's Daily Project Reports.

When possible, bore hole locations were located using Global Positioning System (GPS) techniques and positioned on a map of the site (Figure 2). Locations that were unable to be located via GPS, such as locations inside of buildings, were approximated based on their relationship to existing features such as walls and corners of buildings.

RESULTS

The REAC Laboratory Analytical Reports contain all the analytical results for the soil and groundwater samples, and are presented in Appendix C. The analytical data of interest are presented in Table 2.

The highest concentration of PCE in soil gas was found in the head space sample SB-15s, at an estimated concentration of 130 parts per million by volume (ppmv). The corresponding soil gas sample contained PCE at an estimated concentration of 100 ppmv. These results are estimated since the concentration exceeded the upper linear range of the instrument.

The highest concentration of PCE in soil was found in sample SB-15, at 8,600,000 micrograms per kilogram ($\mu\text{g/Kg}$). In the groundwater sample (SB-17) the highest VOC concentration was *cis*-1,2-dichloroethene at 66,000 micrograms per liter ($\mu\text{g/L}$) and PCE at 16,000 $\mu\text{g/L}$.

SUMMARY, CONCLUSIONS AND RECOMMENDATIONS

The extent of contamination study focused on the area of the building containing the two commercial dry cleaning units, and areas outside the building expected to have the highest probability of contamination. The results show that 1) the soil closest to the commercial dry cleaning units appears to have been impacted by VOC contamination, 2) the contamination may be in the gravel layer between the concrete floor pad and the tight clay soil, 3) and the underlying bedrock may also be contaminated.

A Geophysical survey could determine the presence of buried pipes and underground storage tanks in and around the building that may be the source of, or a potential transport pathway for the VOCs.

cc: Central File - WA # R1A00341(w/attachment)
Electronic File - I:/Archive/REAC3/WA341/
REAC Program Manager (cover page only)

Tables

TABLE 1
Sample Information
Sweet Kleen Site
Buffalo, NY
January 2004

Sample Identification	Location	Collection Mode	Coring Depth (fbgs)	VOCs, ppm (PID)	PCE, ppm (Hapsite)	Sample Matrix
SB-1	Outside of building	GeoProbe	3	0	U	SG
SB-2	Outside of building	GeoProbe	4	4	U	SG, Soil
SB-3	Outside of building	GeoProbe	3	4	U	SG, Soil
SB-4	Outside of building	GeoProbe	3	3	U	SG, Soil
SB-5	Outside of building	GeoProbe	2	3	U	SG, Soil
SB-6	Outside of building	GeoProbe	1	4	U	SG, Soil
SB-7	Outside of building	GeoProbe	2	10	U	SG, Soil
SB-8	Outside of building	GeoProbe	1	15	U	SG, Soil
SB-9	Outside of building	GeoProbe	2	2	U	SG
SB-10	Outside of building	GeoProbe	3	0	U	SG
SB-11	Outside of building	GeoProbe	3	0	U	SG
SB-12	Outside of building	GeoProbe	3	0	U	SG
SB-13	Outside of building	GeoProbe	4	0	U	SG
SB-14	Inside of building	Hand augured	4	0	0.54 *	SG, Soil
SB-15	Inside of building	Hand augured	4	0	100 J *	SG, Soil
SB-16	Inside of building	Hand augured	3.5	<1	U *	SG, Soil
SB-17	Inside of building	Hand augured	6	0	na	GW
SB-18	Inside of building	Hand augured	4	0	6.7 *	SG

SG = Soil Gas, GW = Groundwater

VOCs = Volatile Organic Compounds

fbgs = feet below ground surface

PID = Photo-Ionization Detector

ppm = parts per million

na = not analyzed

PCE = Tetrachloroethene

* = PCE breakdown products also present (*cis*, *trans*-dichloroethene, trichloroethene, vinyl chloride)

U = not detected

J = estimated concentration

< = less than

TABLE 2
Volatile Organic Compound Results
Sweet Kleen Site
Buffalo, NY
January 2004

Compound \ Sample Location	SB-2	SB-3	SB-4	SB-5	SB-6	SB-7	SB-8	SB-14	SB-15	SB-16	SB-17 µg/L
Vinyl chloride	U	U	U	U	U	U	U	U	14	U	1400
Acetone*	U	U	U	3.1J	U	U	U	2.1J	28	U	U
1,1-Dichloroethene	U	U	U	U	U	U	U		3.6	U	U
Methylene Chloride	U	U	U	U	U	U	U	U	2.1	U	U
trans-1,2-Dichloroethene	U	U	U	U	U	U	U	U	14	U	340
2-Butanone	U	U	U	U	U	U	U	U	2.9	U	U
cis-1,2-Dichloroethene	U	U	U	U	U	U	U	110	1300	261,000	66,000
Chloroform	U	U	U	2.4	U	U	U	1.4	2.7	U	U
1,1,1-Trichloroethane	U	U	U	U	U	U	U	U	6.8	U	U
Trichloroethene	U	U	U	6.6	U	5.4	2.5	43	2,600	16,000	45,000
1,1,2-Trichloroethane	U	U	U	U	U	U	U	U	14	U	U
Tetrachloroethene	67	12	10	250	14	590	16	6,200	8,600,000	5,300,000	16,000

Above results in micrograms per Kilogram (µg/Kg) except SB-17 which is in micrograms per Liter (µg/L).

U = not detected

J = estimated concentration, below method detection limit

BTEX = benzene, toluene, ethyl benzene, xylene(s)

TABLE 2
Volatile Organic Compound Results
Sweet Kleen Site
Buffalo, NY
January 2004

Compound \ Sample Location	SB-2	SB-3	SB-4	SB-5	SB-6	SB-7	SB-8	SB-14	SB-15	SB-16	SB-17, µg/L
Chlorobenzene	U	U	U	U	U	U	U	U	7.2	U	U
1,1,1,2-Tetrachloroethane	U	U	U	U	U	U	U	U	61	U	U
Isopropylbenzene	U	U	U	U	U	U	U	U	U	510	U
1,1,2,2-Tetrachloroethane	U	U	U	U	U	U	U	U	6.1	U	U
1,2,3-Trichloropropane	U	U	U	U	U	U	U	U	3.6	U	U
n-propylbenzene	U	U	U	U	U	U	U	U	U	1,600	170
1,3,5-Trimethylbenzene	U	U	U	U	U	U	U	U	U	2,300	U
1,2,4-Trimethylbenzene	U	U	U	U	U	U	U	U	1.3	17,000	2,300
sec-Butylbenzene	U	U	U	U	U	U	U	U	U	1,700	150
p-Isopropyltoluene	U	U	U	U	U	U	U	U	U	2,100	130
n-Butylbenzene	U	U	U	U	U	U	U	U	U	U	140
Naphthalene	U	U	U	U	U	U	U	U	U	530	U
total BTEX	U	U	U	U	U	U	U	U	23.7	2,340	590

Above results in micrograms per Kilogram (µg/Kg) except SB-17 which is in micrograms per Liter (µg/L).

U = not detected

J = estimated concentration, below method detection limit

BTEX = benzene, toluene, ethyl benzene, xylene(s)

TABLE 2
Volatile Organic Compound Results
Sweet Kleen Site
Buffalo, NY
January 2004

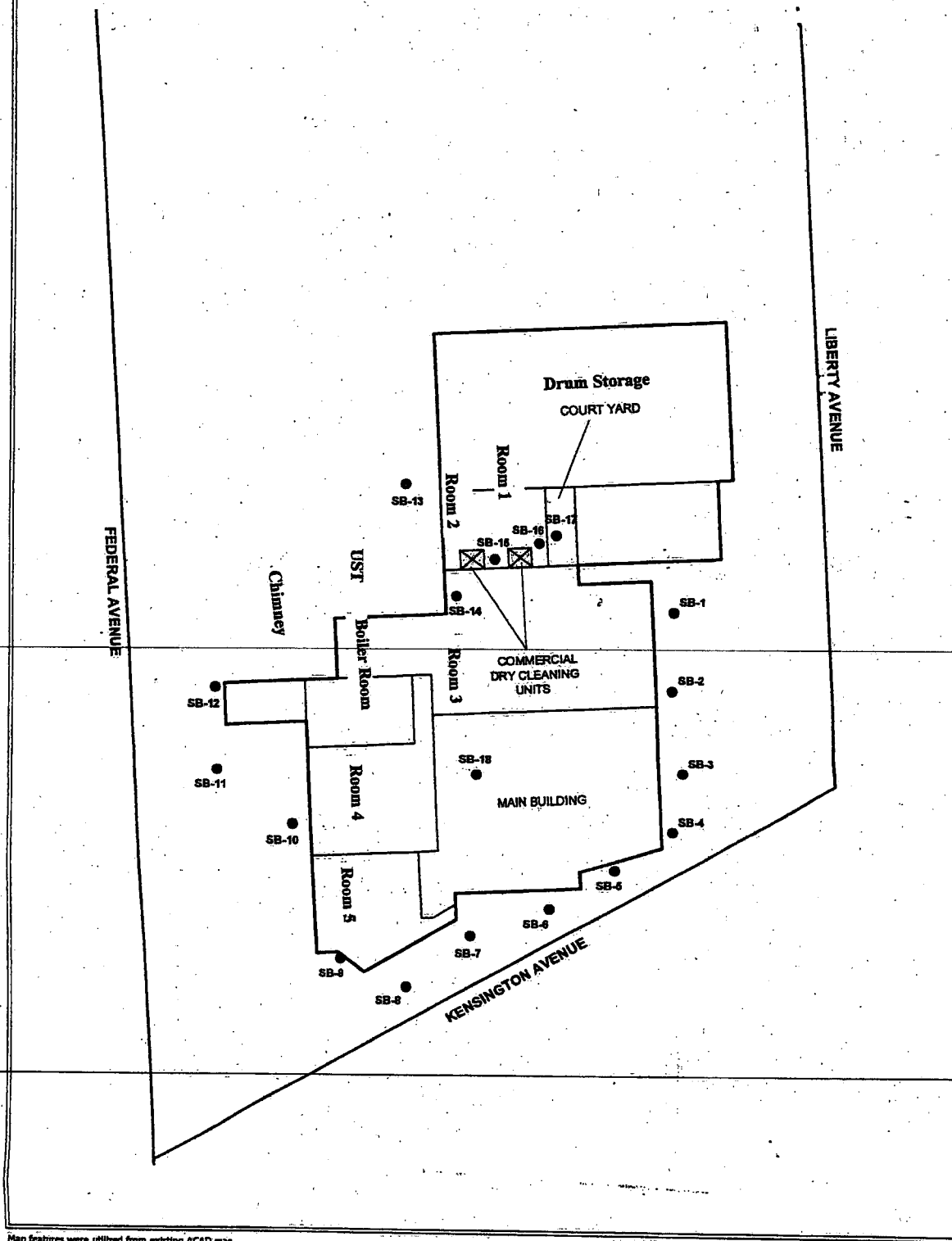
Compound \ Sample Location	SB-2	SB-3	SB-4	SB-5	SB-6	SB-7	SB-8	SB-14	SB-15	SB-16	SB-17 µg/L
Chlorobenzene	U	U	U	U	U	U	U	U	7.2	U	U
1,1,1,2-Tetrachloroethane	U	U	U	U	U	U	U	U	61	U	U
Isopropylbenzene	U	U	U	U	U	U	U	U	U	510	U
1,1,2,2-Tetrachloroethane	U	U	U	U	U	U	U	U	6.1	U	U
1,2,3-Trichloropropane	U	U	U	U	U	U	U	U	3.6	U	U
n-propylbenzene	U	U	U	U	U	U	U	U	U	1,600	170
1,3,5-Trimethylbenzene	U	U	U	U	U	U	U	U	U	2,300	U
1,2,4-Trimethylbenzene	U	U	U	U	U	U	U	U	1.3	17,000	2,300
sec-Butylbenzene	U	U	U	U	U	U	U	U	U	1,700	150
p-Isopropyltoluene	U	U	U	U	U	U	U	U	U	2,100	130
n-Butylbenzene	U	U	U	U	U	U	U	U	U	U	140
Naphthalene	U	U	U	U	U	U	U	U	U	530	U
total BTEX	U	U	U	U	U	U	U	U	23.7	2,340	590

Above results in micrograms per Kilogram (µg/Kg) except SB-17 which is in micrograms per Liter (µg/L).
U = not detected

J = estimated concentration, below method detection limit

BTEX = benzene, toluene, ethyl benzene, xylene(s)

Figures



Map features were utilized from existing ACAD map.
 Site survey GPS data was used for sample locations and georeferencing
 the ACAD drawing.
 GPS data collected in Lat, Lon decimal Degrees, WGS84.

Map Creation Date: 29January2004

Map projection: UTM, Zone 17N
 Datum: NAD83
 Units: Meters

Legend

● Soil Boring Location

30 0 30 60 90 Feet



U.S. EPA Environmental Response Team Center
 Response Engineering and Analytical Contract
 68-C99-223
 W.A. # R1A00341

Figure 2
 Sample Location Map
 Sweet Klean Site
 Buffalo, New York
 January 2004

APPENDIX A
Hapsite Screening Results for Volatile Organic Compounds in Air
Sweet Kleen Site
Trip Report
January 2004

Hapsite GC/MS Results of Target Compounds for Volatile Organic Compounds in Air
Sweet Kleen Site
Buffalo, NY
December 2003

Data File	12160307	12160308	12160309	12160310	12160311	12160313
Sample Number	Tedlar Nitrogen Blank	09304	09302	09303	09305	09306
Sample Location		Ambient	System Blank	SB-1	SB-2	SB-3
Limit of Quantitation (ppmv)	0.2	0.2	0.2	0.2	0.2	0.2
Date Sampled	16 Dec 2003	16 Dec 2003	16 Dec 2003	16 Dec 2003	16 Dec 2003	16 Dec 2003
Date Analyzed	16 Dec 2003	16 Dec 2003	16 Dec 2003	16 Dec 2003	16 Dec 2003	16 Dec 2003
Vinyl Chloride	U	U	U	U	U	U
1,1-Dichloroethene	U	U	U	U	U	U
1,2-trans-Dichloroethene	U	U	U	U	U	U
1,2-cis-Dichloroethene	U	U	U	U	U	U
Benzene	U	U	U	U	U	U
Trichloroethene	U	U	U	U	U	U
Toluene	U	U	U	0.27	U	U
Tetrachloroethene	U	U	U	U	U	U
Ethyl Benzene	U	U	U	U	U	U
meta- & para-Xylene	U	U	U	U	U	U
ortho-Xylene	U	U	U	U	U	U

Data File	12160314	12160315	12160316	12160317	12160318	12160319
Sample Number	09307	09308	09309	09310	09311	09312
Sample Location	SB-4	SB-5	SB-6	SB-7	SB-8	SB-9
Limit of Quantitation (ppmv)	0.2	0.2	0.2	0.2	0.2	0.2
Date Sampled	16 Dec 2003	16 Dec 2003	16 Dec 2003	16 Dec 2003	16 Dec 2003	16 Dec 2003
Date Analyzed	16 Dec 2003	16 Dec 2003	16 Dec 2003	16 Dec 2003	16 Dec 2003	16 Dec 2003
Vinyl Chloride	U	U	U	U	U	U
1,1-Dichloroethene	U	U	U	U	U	U
1,2-trans-Dichloroethene	U	U	U	U	U	U
1,2-cis-Dichloroethene	U	U	U	U	U	U
Benzene	U	U	U	U	U	U
Trichloroethene	U	U	U	U	U	U
Toluene	U	U	U	U	U	U
Tetrachloroethene	U	U	0.21	U	U	U
Ethyl Benzene	U	U	U	U	U	U
meta- & para-Xylene	U	U	U	U	U	U
ortho-Xylene	U	U	U	U	U	U

Data File	12160320	12160321	12160322	12160323
Sample Number	09313	09314	09315	09316
Sample Location	SB-10	SB-11	SB-12	SB-13
Limit of Quantitation (ppmv)	0.2	0.2	0.2	0.2
Date Sampled	16 Dec 2003	16 Dec 2003	16 Dec 2003	16 Dec 2003
Date Analyzed	16 Dec 2003	16 Dec 2003	16 Dec 2003	16 Dec 2003
Vinyl Chloride	U	U	U	U
1,1-Dichloroethene	U	U	U	U
1,2-trans-Dichloroethene	U	U	U	U
1,2-cis-Dichloroethene	U	U	U	U
Benzene	U	U	U	U
Trichloroethene	U	U	U	U
Toluene	U	U	U	U
Tetrachloroethene	U	U	U	U
Ethyl Benzene	U	U	U	U
meta- & para-Xylene	U	U	U	U
ortho-Xylene	U	U	U	U

U data reported as ppmv = Parts per million by volume
= None detected at or above the limit of quantitation.

Hapsite GC/MS Results of Target Compounds for Volatile Organic Compounds in Air
Sweet Kleen Site
Buffalo, NY
December 2003

Data File	12170306	12170307	12170308	12170309	12170310	12170311
Sample Number	Nitrogen Tedlar Blank	09317	09318	09319	09320	09321
Sample Location		Ambient	SB-14	SB-15	ryer Reservoir	SB-15S
Limit of Quantitation (ppmv)	0.2	0.2	0.2	0.2	0.2	0.2
Date Sampled	17 Dec 2003	17 Dec 2003	17 Dec 2003	17 Dec 2003	17 Dec 2003	17 Dec 2003
Date Analyzed	17 Dec 2003	17 Dec 2003	17 Dec 2003	17 Dec 2003	17 Dec 2003	17 Dec 2003
Vinyl Chloride	U	U	U	0.48	U	U
1,1-Dichloroethene	U	U	U	U	U	U
1,2-trans-Dichloroethene	U	U	U	U	U	U
1,2-cis-Dichloroethene	U	U	0.42	4	U	U
Benzene	U	U	U	0.91	U	U
Trichloroethene	U	U	U	U	U	U
Toluene	U	U	0.54	100 J	46 J	130 J
Tetrachloroethene	U	U	U	U	U	U
Ethyl Benzene	U	U	U	U	U	U
meta- & para-Xylene	U	U	U	U	U	U
ortho-Xylene	U	U	U	U	U	U

Data File	12170312	12170313	12170315	12170316	12170318
Sample Number	09322	09323	09325	09326	09326
Sample Location	SB-14S	SB-16	SB-18	SB-18S	SB-18S
Limit of Quantitation (ppmv)	0.2	0.2	0.2	0.2	0.2
Date Sampled	17 Dec 2003	17 Dec 2003	17 Dec 2003	17 Dec 2003	17 Dec 2003
Date Analyzed	17 Dec 2003	17 Dec 2003	17 Dec 2003	17 Dec 2003	17 Dec 2003
Vinyl Chloride	U	2.5	U	U	U
1,1-Dichloroethene	U	U	U	U	U
1,2-trans-Dichloroethene	U	U	U	U	U
1,2-cis-Dichloroethene	0.51	36 J	2.1	U	U
Benzene	U	U	U	U	U
Trichloroethene	U	1.4	2.8	U	U
Toluene	U	U	U	U	U
Tetrachloroethene	23 J	U	6.7	0.76	1.0
Ethyl Benzene	U	U	U	U	U
meta- & para-Xylene	U	U	U	U	U
ortho-Xylene	U	U	U	U	U

all data reported as ppmv = Parts per million by volume

U = None detected at or above the limit of quantitation.

J = Result is considered estimated.

Hapsite GC/MS Sample Duplicate Summary for Volatile Organic Compounds in Air
Sweet Kleen Site
Buffalo, NY
December 2003

Data File	12160311	12160312	
Sample Number	09305	09305	
Sample Location	SB-2	SB-2 Duplicate	
Limit of Quantitation (ppmv)	0.2	0.2	
Date Sampled	16 Dec 2003	16 Dec 2003	
Date Analyzed	16 Dec 2003	16 Dec 2003	RPD
Vinyl Chloride	U	U	N/A
1,1-Dichloroethene	U	U	N/A
1,2-trans-Dichloroethene	U	U	N/A
1,2-cis-Dichloroethene	U	U	N/A
Benzene	U	U	N/A
Trichloroethene	U	U	N/A
Toluene	U	U	N/A
Tetrachloroethene	U	U	N/A
Ethyl Benzene	U	U	N/A
meta- & para-Xylene	U	U	N/A
ortho-Xylene	U	U	N/A

Data File	12170313	12170314	
Sample Number	09323	09323	
Sample Location	SB-16	SB-16 Duplicate	
Limit of Quantitation (ppmv)	0.2	0.2	
Date Sampled	17 Dec 2003	17 Dec 2003	
Date Analyzed	17 Dec 2003	17 Dec 2003	RPD
Vinyl Chloride	2.5	2.3	8
1,1-Dichloroethene	U	U	N/A
1,2-trans-Dichloroethene	U	U	N/A
1,2-cis-Dichloroethene	36 J	35 J	3
Benzene	U	U	N/A
Trichloroethene	1.4	1.3	7
Toluene	U	U	N/A
Tetrachloroethene	U	U	N/A
Ethyl Benzene	U	U	N/A
meta- & para-Xylene	U	U	N/A
ortho-Xylene	U	U	N/A

RPD = Relative percent difference
all data reported as ppmv = Parts per million by volume
U = None detected at or above the limit of quantitation.
J = Result is considered estimated.
N/A = Not applicable

Attachment 4

RST Chimney Sampling Results

RST Sampling
Chimney Sample
Drum Sample

Table 1
WASTE SAMPLE DESCRIPTIONS
SWEET KLEEN LAUNDRY SITE
BUFFALO, NEW YORK

Sample Number	Date	Time	Description	Analysis
SKL-DR- 01	12/16/03	1420	Liquid sample, collected from a 30-gallon poly drum	RCRA Characteristics Analysis (Ignitability, Corrosivity and Reactivity)
SKL-DR- 04	12/16/03	1515	Liquid sample, collected from a 30-gallon poly drum	Full TCLP Scan
SKL-DR- 05	12/17/03	1020	Liquid sample, collected from a 5-gallon poly drum	RCRA Characteristics Analysis (Ignitability, Corrosivity and Reactivity)
SKL-DR- 06	12/17/03	1030	Liquid sample, collected from a 5-gallon metal drum	Full TCLP Scan
SKL-DR- 07	12/17/03	1010	Liquid sample, collected from a 5-gallon poly drum	RCRA Characteristics Analysis (Ignitability, Corrosivity and Reactivity)
SKL-DR- 08	12/17/03	1035	Two phase liquid sample, collected from a 5-gallon poly drum	RCRA Characteristics Analysis (Ignitability, Corrosivity and Reactivity) on both phases
SKL-DR- 09	12/17/03	1040	Liquid sample, collected from a 5-gallon poly drum	RCRA Characteristics Analysis (Ignitability, Corrosivity and Reactivity)
SKL-T- 01	12/17/03	1055	Liquid sample, collected from a transformer cells	Polychlorinated Biphenyls (PCBs)
SKL-S- 01	12/16/03	1600	Liquid sample, collected from the courtyard sump	RCRA Characteristics Analysis (Ignitability, Corrosivity and Reactivity)
SKL-S- 02	12/16/03	1600	Liquid sample, collected from the courtyard sump	RCRA Characteristics Analysis (Ignitability, Corrosivity and Reactivity)
SKL-S- 03	12/16/03	1600	Liquid sample, collected from the courtyard sump	RCRA Characteristics Analysis (Ignitability, Corrosivity and Reactivity)
SKL-C- 01	12/17/03	1200	Ash sample, collected from the chimney floor	Full TCLP Scan, PAHs
SKL-L-R5- 01	12/16/03	1600	debris fill sample	TAL Lead

LIBERTY AVE.

PARKING

Outdoor Drum Storage →

Warehouse

Warehouse

ROOM 1

LAUNDRY ROOM 3

ROOM 2

Boiler Room

SHIPPING

ROOM 4

ROOM 5

UST

Chimney

PARKING

PARKING

KENSINGTON AVE.

FEDERAL AVE.

SAMPLE LOCATIONS

M1 = SKL-DR-01 M5 = S SUMP SAMPLE LOCATIONS M6 = SKL-A-21-01 M10 = SKL-A-25-01 M12 = SKL-A-24-01
 M2 = SKL-DR-02 SKL-S-01 M7 = SKL-A-21-02 M11 = SKL-L-25-01 M13 = SKL-T-01
 M3 = SKL-DR-03 SKL-S-02 M8 = SKL-A-21-03 M14 = SKL-C-01
 M4 = SKL-DR-04 SKL-S-03 M9 = SKL-A-22-01

*NOTE: Information only based on areas accessible to RST personnel.

LEGEND

 COLLAPSED ROOF
 chimney



Weston Solutions Inc.
FEDERAL PROGRAMS DIVISION

IN ASSOCIATION WITH SCIENTIFIC ENVIRONMENTAL ASSOCIATES, INC.
RESOURCE APPLICATIONS, INC.
AND INNOVATIVE TECHNOLOGICAL SOLUTIONS INC.

**FIGURE 2
SAMPLE LOCATION MAP
SWEET KLEEN LAUNDRY
BUFFALO, NY**

US ENVIRONMENTAL PROTECTION AGENCY
 REMOVAL SUPPORT TEAM
 CONTRACT # 68-W-00-113

EDITED BY: W. HENSBERGER

EPA OSC: K. MATHEIS

SITE PROJECT MANAGER: A. LEVY

FILE: G:\DMS\SWEETKLEEN



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WESTON SOLUTIONS
1090 King Georges Post Road, Suite 201
Edison NJ, 08837

Project: 4256
Project Number: 0042074
Project Manager: Smita Sumbaly

Reported:
01/12/04 08:36

TCLP Metals by EPA 200 Series Methods

GLA Laboratories

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Drum Sample									
SKL-DR-04 (K312485-02) Waste (L)	Sampled: 12/16/03 15:15 Received: 12/18/03 14:40								
Arsenic	ND	0.10	mg/l	1	3122323	12/23/03	12/29/03	EPA 200.7	
Barium	0.49	0.010	"	"	"	"	"	"	
Cadmium	ND	0.0080	"	"	"	"	"	"	
Chromium	0.44	0.10	"	"	"	"	"	"	
Lead	ND	0.20	"	"	"	"	"	"	
Selenium	ND	0.10	"	"	"	"	"	"	
Silver	ND	0.040	"	"	"	"	"	"	
SKL-DR-06 (K312485-04) Waste (L)									
Sampled: 12/17/03 10:30 Received: 12/18/03 14:40									
Arsenic	ND	0.10	mg/l	1	3122323	12/23/03	12/29/03	EPA 200.7	
Barium	ND	0.010	"	"	"	"	"	"	
Cadmium	ND	0.0080	"	"	"	"	"	"	
Chromium	ND	0.10	"	"	"	"	"	"	
Lead	ND	0.20	"	"	"	"	"	"	
Selenium	ND	0.10	"	"	"	"	"	"	
Silver	ND	0.040	"	"	"	"	"	"	
SKL-C-01 (K312485-13) Solid									
Sampled: 12/17/03 12:00 Received: 12/18/03 14:40									
Arsenic	0.12	0.10	mg/l	1	3122323	12/23/03	12/29/03	EPA 200.7	
Barium	0.051	0.010	"	"	"	"	"	"	
Cadmium	0.031	0.0080	"	"	"	"	"	"	
Chromium	ND	0.10	"	"	"	"	"	"	
Lead	ND	0.20	"	"	"	"	"	"	
Selenium	ND	0.10	"	"	"	"	"	"	
Silver	ND	0.040	"	"	"	"	"	"	
Chimney Ash									

GLA Laboratories

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.


Kristy Sheth, Project Manager



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WESTON SOLUTIONS
 1090 King Georges Post Road, Suite 201
 Edison NJ, 08837

Project: 4256
 Project Number: 0042074
 Project Manager: Smita Sumbaly

Reported:
 01/12/04 08:36

TCLP Volatile Organic Compounds by EPA Method 1311/8260B
GLA Laboratories

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Chimney Sample									
SKL-C-01 (K312485-13) Solid	Sampled: 12/17/03 12:00 Received: 12/18/03 14:40								
Benzene	ND	50	ug/l	50	3122435	12/24/03	12/25/03	LPA 8260B	
Carbon tetrachloride	ND	100	"	"	"	"	"	"	
Chlorobenzene	ND	100	"	"	"	"	"	"	
Chloroform	ND	100	"	"	"	"	"	"	
1,2-Dichloroethane	ND	100	"	"	"	"	"	"	
1,1-Dichloroethylene	ND	2500	"	"	"	"	"	"	
Methyl ethyl ketone	120	50	"	"	"	"	"	"	
Tetrachloroethylene	62	50	"	"	"	"	"	"	
Trichloroethylene	ND	100	"	"	"	"	"	"	
Vinyl chloride									
Surrogate: Dibromofluoromethane		103 %		85.7-115	"	"	"	"	
Surrogate: 1,2-Dichloroethane-d4		103 %		85.5-118	"	"	"	"	
Surrogate: Toluene-d8		104 %		80-120	"	"	"	"	

GLA Laboratories

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Kristy Sheth, Project Manager



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WESTON SOLUTIONS
1090 King Georges Post Road, Suite 201
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Project: 4256
Project Number: 0042074
Project Manager: Smita Sumbaly

Reported:
01/12/04 08:36

TCLP Volatile Organic Compounds by EPA Method 1311/8260B
GLA Laboratories

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Drum Sample									
SKL-DR-04 (K312485-02) Waste (L)	Sampled: 12/16/03 15:15 Received: 12/18/03 14:40								
Benzene	ND	50	ug/l	50	3122435	12/24/03	12/25/03	EPA 8260B	
Carbon tetrachloride	ND	100	"	"	"	"	"	"	
Chlorobenzene	220	100	"	"	"	"	"	"	
Chloroform	ND	100	"	"	"	"	"	"	
1,2-Dichloroethane	ND	100	"	"	"	"	"	"	
1,1-Dichloroethylene	ND	2500	"	"	"	"	"	"	
Methyl ethyl ketone	1000000	50000	"	50000	"	"	12/30/03	"	DILN
Tetrachloroethylene	330	50	"	50	"	"	12/25/03	"	
Trichloroethylene	ND	100	"	"	"	"	"	"	
Vinyl chloride									
Surrogate: Dibromofluoromethane		99.8 %		85.7-115	"	"	"	"	
Surrogate: 1,2-Dichloroethane-d4		100 %		85.5-118	"	"	"	"	
Surrogate: Toluene-d8		103 %		80-120	"	"	"	"	

SKL-DR-06 (K312485-04) Waste (L)	Sampled: 12/17/03 10:30 Received: 12/18/03 14:40								
Benzene	ND	50	ug/l	50	3122435	12/24/03	12/25/03	EPA 8260B	
Carbon tetrachloride	ND	100	"	"	"	"	"	"	
Chlorobenzene	ND	100	"	"	"	"	"	"	
Chloroform	ND	100	"	"	"	"	"	"	
1,2-Dichloroethane	ND	100	"	"	"	"	"	"	
1,1-Dichloroethylene	ND	2500	"	"	"	"	"	"	
Methyl ethyl ketone	190	50	"	"	"	"	"	"	
Tetrachloroethylene	ND	50	"	"	"	"	"	"	
Trichloroethylene	ND	100	"	"	"	"	"	"	
Vinyl chloride									
Surrogate: Dibromofluoromethane		101 %		85.7-115	"	"	"	"	
Surrogate: 1,2-Dichloroethane-d4		102 %		85.5-118	"	"	"	"	
Surrogate: Toluene-d8		103 %		80-120	"	"	"	"	

GLA Laboratories

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.

Kristy Sheth, Project Manager

Date: 03/09/2004
Time: 13:59:33

RFP No. 4384
TOTAL TAL METALS

Rept: AND326

Chimney Sample

Chimney Sample

Client ID Job No Sample Date		Lab ID		SKL-C-02 A04-1691 03/02/2004		A4169101		SKL-C-03 A04-1691 03/02/2004		A4169102			
Analyte	Units	Sample Value	Reporting Limit	Sample Value	Reporting Limit	Sample Value	Reporting Limit	Sample Value	Reporting Limit	Sample Value	Reporting Limit	Sample Value	Reporting Limit
Aluminum - Total	MG/KG	12900	13.8	7950	19.0								
Antimony - Total	MG/KG	ND	20.8	ND	28.5	NA		NA		NA		NA	
Arsenic - Total	MG/KG	184	2.8	ND	3.8	NA		NA		NA		NA	
Barium - Total	MG/KG	135	0.69	87.8	0.95	NA		NA		NA		NA	
Beryllium - Total	MG/KG	3.4	0.28	620	0.38	NA		NA		NA		NA	
Cadmium - Total	MG/KG	0.44	0.28	1.8	0.38	NA		NA		NA		NA	
Calcium - Total	MG/KG	7140	13.8	5.9	19.0	NA		NA		NA		NA	
Chromium - Total	MG/KG	25.0	0.69	7040	0.95	NA		NA		NA		NA	
Cobalt - Total	MG/KG	7.9	0.69	34.2	0.95	NA		NA		NA		NA	
Copper - Total	MG/KG	98.8	1.4	7.6	0.95	NA		NA		NA		NA	
Iron - Total	MG/KG	13000	13.8	108	1.9	NA		NA		NA		NA	
Lead - Total	MG/KG	41.6	1.4	44000	19.0	NA		NA		NA		NA	
Magnesium - Total	MG/KG	1360	27.7	2160	1.9	NA		NA		NA		NA	
Manganese - Total	MG/KG	32.0	0.28	1570	38.0	NA		NA		NA		NA	
Mercury - Total	MG/KG	0.33	0.025	252	0.38	NA		NA		NA		NA	
Nickel - Total	MG/KG	21.8	0.69	0.12	0.035	NA		NA		NA		NA	
Potassium - Total	MG/KG	4080	41.5	45.5	0.95	NA		NA		NA		NA	
Selenium - Total	MG/KG	38.9	5.5	1500	56.9	NA		NA		NA		NA	
Silver - Total	MG/KG	ND	0.69	11.3	7.6	NA		NA		NA		NA	
Sodium - Total	MG/KG	1280	194	ND	0.95	NA		NA		NA		NA	
Thallium - Total	MG/KG	ND	8.3	686	266	NA		NA		NA		NA	
Vanadium - Total	MG/KG	31.3	0.69	19.5	11.4	NA		NA		NA		NA	
Zinc - Total	MG/KG	70.8	2.8	4340	38.0	NA		NA		NA		NA	

NA = Not Applicable ND = Not Detected

STC Buffalo

Date: 03/09/2004 Time: 13:59:08	RFP No. 4386 METHOD 8260 - TCL VOLATILE ORGANICS	Rept: AN0326
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Chimney Sample *Chimney Sample*

Client ID	Lab ID	SKL-C-02 A04-1691 03/02/2004	A4169101	SKL-C-03 A04-1691 03/02/2004	A4169102		
Job No							
Sample Date							

Analyte	Units	Sample Value	Reporting Limit	Sample Value	Reporting Limit	Sample Value	Reporting Limit	Sample Value	Reporting Limit
1,1,2-Trichloro-1,2,2-trifluor	UG/KG	ND	7	ND	9	NA		NA	
Trichlorofluoromethane	UG/KG	ND	7	ND	9	NA		NA	
Trichloroethene	UG/KG	ND	7	ND	9	NA		NA	
Vinyl chloride	UG/KG	ND	13	ND	19	NA		NA	
Total Xylenes	UG/KG	ND	20	ND	28	NA		NA	
-IS/SURROGATE(S)-									
Chlorobenzene-D5	%	89	50-200	102	50-200	NA		NA	
1,4-Difluorobenzene	%	97	50-200	106	50-200	NA		NA	
1,4-Dichlorobenzene-D4	%	81	50-200	104	50-200	NA		NA	
Toluene-D8	%	110	71-125	100	71-125	NA		NA	
p-Bromofluorobenzene	%	103	68-124	98	68-124	NA		NA	
1,2-Dichloroethane-D4	%	114	61-136	92	61-136	NA		NA	

NA = Not Applicable ND = Not Detected

STL Buffalo

Date: 03/09/2004
Time: 13:59:08

RFP No. 4384
METHOD 8260 - TCL VOLATILE ORGANICS

Rept: AN0326

Chimney Sample

Chimney Sample

Client ID	Lab ID	SKL-C-02	A4169101	SKL-C-03	A4169102				
Job No		A04-1691		A04-1691					
Sample Date		03/02/2004		03/02/2004					
Analyte	Units	Sample Value	Reporting Limit	Sample Value	Reporting Limit	Sample Value	Reporting Limit	Sample Value	Reporting Limit
Acetone	UG/KG	ND	33	ND	47	NA		NA	
Benzene	UG/KG	ND	7	ND	9	NA		NA	
Bromodichloromethane	UG/KG	ND	7	ND	9	NA		NA	
Bromoform	UG/KG	ND	7	ND	9	NA		NA	
Bromomethane	UG/KG	ND	7	ND	9	NA		NA	
2-Butanone	UG/KG	ND	7	ND	9	NA		NA	
Carbon Disulfide	UG/KG	ND	33	ND	47	NA		NA	
Carbon Tetrachloride	UG/KG	ND	7	ND	9	NA		NA	
Chlorobenzene	UG/KG	ND	7	ND	9	NA		NA	
Chloroethane	UG/KG	ND	7	ND	9	NA		NA	
Chloroform	UG/KG	ND	7	ND	9	NA		NA	
Chloromethane	UG/KG	ND	7	ND	9	NA		NA	
Cyclohexane	UG/KG	ND	7	ND	9	NA		NA	
1,2-Dibromoethane	UG/KG	ND	7	ND	9	NA		NA	
Dibromochloromethane	UG/KG	ND	7	ND	9	NA		NA	
1,2-Dibromo-3-chloropropane	UG/KG	ND	7	ND	9	NA		NA	
1,2-Dichlorobenzene	UG/KG	ND	7	ND	9	NA		NA	
1,3-Dichlorobenzene	UG/KG	ND	7	ND	9	NA		NA	
1,4-Dichlorobenzene	UG/KG	ND	7	ND	9	NA		NA	
Dichlorodifluoromethane	UG/KG	ND	7	ND	9	NA		NA	
1,1-Dichloroethane	UG/KG	ND	7	ND	9	NA		NA	
1,2-Dichloroethane	UG/KG	ND	7	ND	9	NA		NA	
1,1-Dichloroethene	UG/KG	ND	7	ND	9	NA		NA	
cis-1,2-Dichloroethene	UG/KG	ND	7	ND	9	NA		NA	
trans-1,2-Dichloroethene	UG/KG	ND	7	ND	9	NA		NA	
1,2-Dichloropropane	UG/KG	ND	7	ND	9	NA		NA	
cis-1,3-Dichloropropane	UG/KG	ND	7	ND	9	NA		NA	
trans-1,3-Dichloropropane	UG/KG	ND	7	ND	9	NA		NA	
Ethylbenzene	UG/KG	ND	7	ND	9	NA		NA	
2-Hexanone	UG/KG	ND	7	ND	9	NA		NA	
Isopropylbenzene	UG/KG	ND	33	ND	47	NA		NA	
Methyl acetate	UG/KG	ND	7	ND	9	NA		NA	
Methylcyclohexane	UG/KG	ND	7	ND	9	NA		NA	
Methylene chloride	UG/KG	9	7	ND	9	NA		NA	
4-Methyl-2-pentanone	UG/KG	ND	7	ND	9	NA		NA	
Methyl tert butyl ether	UG/KG	ND	33	ND	47	NA		NA	
Styrene	UG/KG	ND	7	ND	9	NA		NA	
1,1,2,2-Tetrachloroethane	UG/KG	ND	7	ND	9	NA		NA	
Tetrachloroethene	UG/KG	ND	7	ND	9	NA		NA	
Toluene	UG/KG	ND	7	ND	9	NA		NA	
1,2,4-Trichlorobenzene	UG/KG	ND	7	ND	9	NA		NA	
1,1,1-Trichloroethane	UG/KG	ND	7	ND	9	NA		NA	
1,1,2-Trichloroethane	UG/KG	ND	7	ND	9	NA		NA	

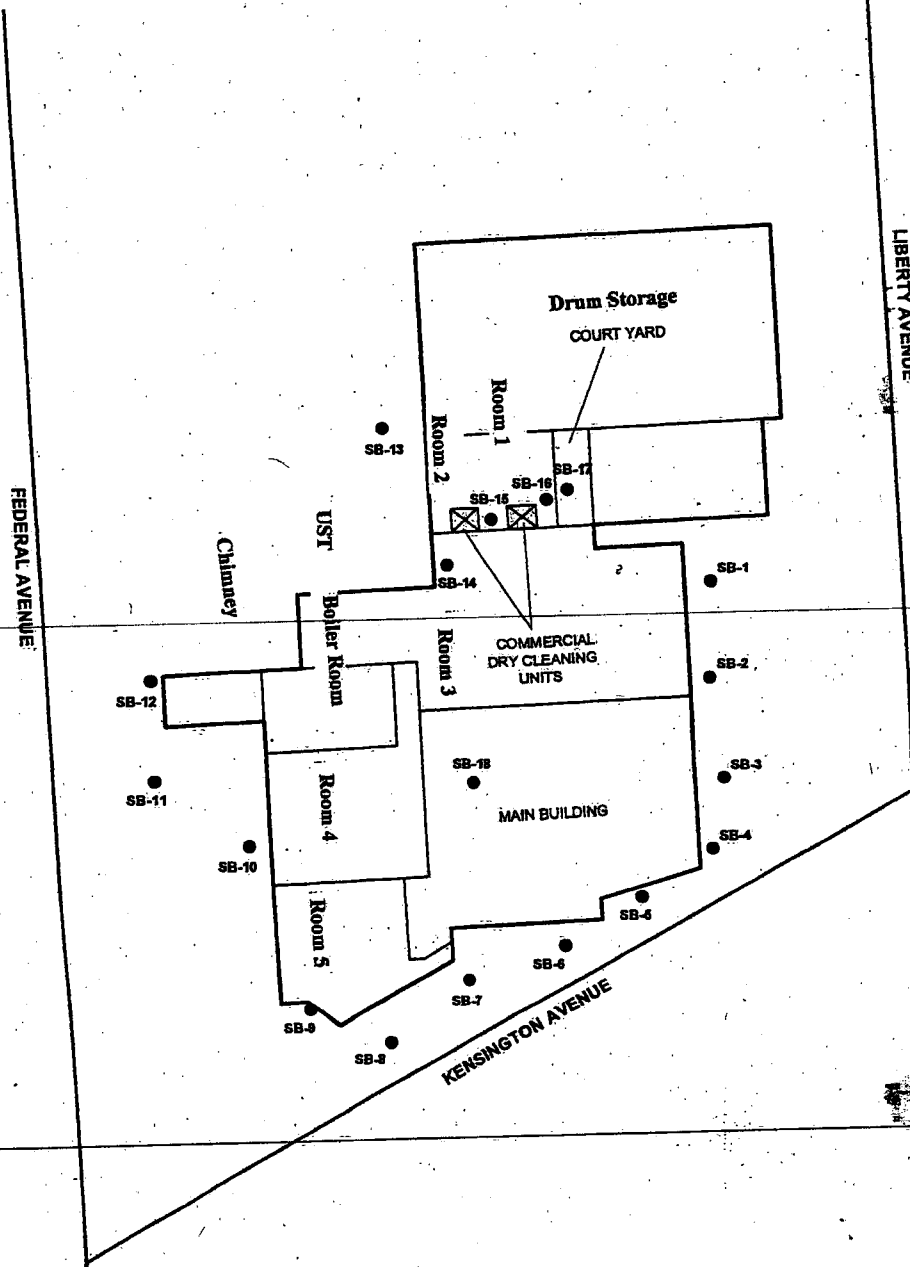
NA = Not Applicable ND = Not Detected

STL Buffalo

Attachment 5

Maps, Site Diagrams & Site Photographs

Attachment 5
Figure 2
Site Layout



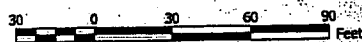
Map features were utilized from existing ACAD map.
Site survey GPS data was used for sample locations and georeferencing the ACAD drawing.
GPS data collected in Lat, Lon decimal Degree, WGS84.

Map Creation Date: 25 January 2004

Map projection: UTM, Zone 17N
Datum: NAD83
Units: Meters

Legend

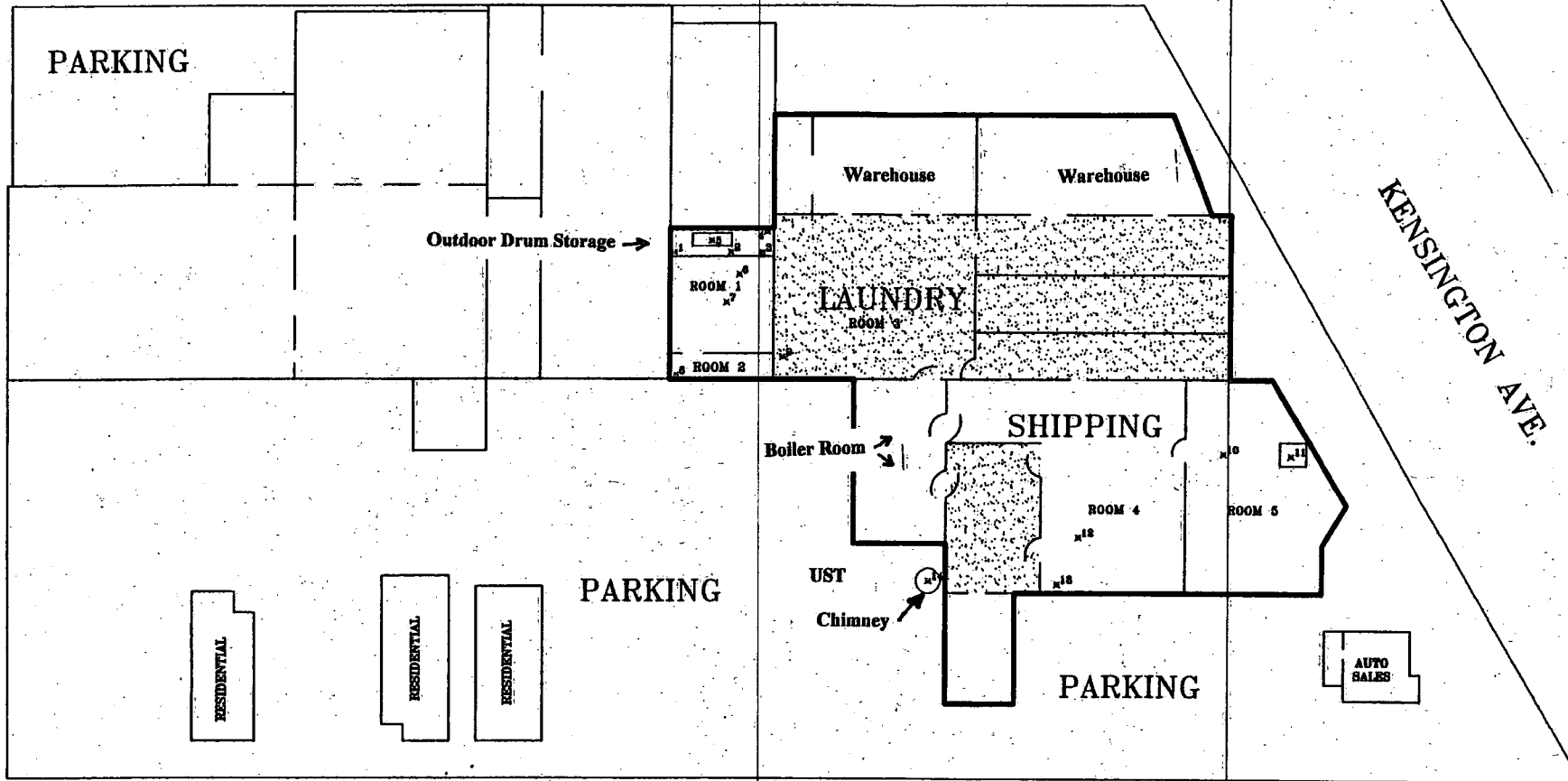
● Soil Boring Location



U.S. EPA Environmental Response Team Center
Response Engineering and Analytical Contract
68-C99-223
W.A. # R1A00341

Figure 2
Sample Location Map
Sweet Klean Site
Buffalo, New York
January 2004

LIBERTY AVE.



Attachment 5
Figure 3
Site Layout

FEDERAL AVE.

SAMPLE LOCATIONS

M1 = SKL-DR-01	M5 = 9 HUMP SAMPLE LOCATIONS	M6 = SKL-A-R1-01	M10 = SKL-A-R2-01	M12 = SKL-A-R4-01
M2 = SKL-DR-02	SKL-S-01	M7 = SKL-A-R1-02	M11 = SKL-L-R2-01	M13 = SKL-T-01
M3 = SKL-DR-03	SKL-S-02	M8 = SKL-A-R2-01	M12 = SKL-S-01	M14 = SKL-C-01
M4 = SKL-DR-04	SKL-S-03	M9 = SKL-A-R3-01	SKL-DR-1	
			SKL-DR-2	
			SKL-DR-3	

*NOTE: Information only based on areas accessible to RST personnel.

LEGEND

 COLLAPSED ROOF



Western Solutions Inc.
FEDERAL PROGRAMS DIVISION

IN ASSOCIATION WITH SCIENTIFIC ENVIRONMENTAL ASSOCIATES, INC.
RESOURCE APPLICATIONS, INC.,
AND INNOVATIVE TECHNOLOGICAL SOLUTIONS INC.

**FIGURE 2
SAMPLE LOCATION MAP
SWEET KLEEN LAUNDRY
BUFFALO, NY**

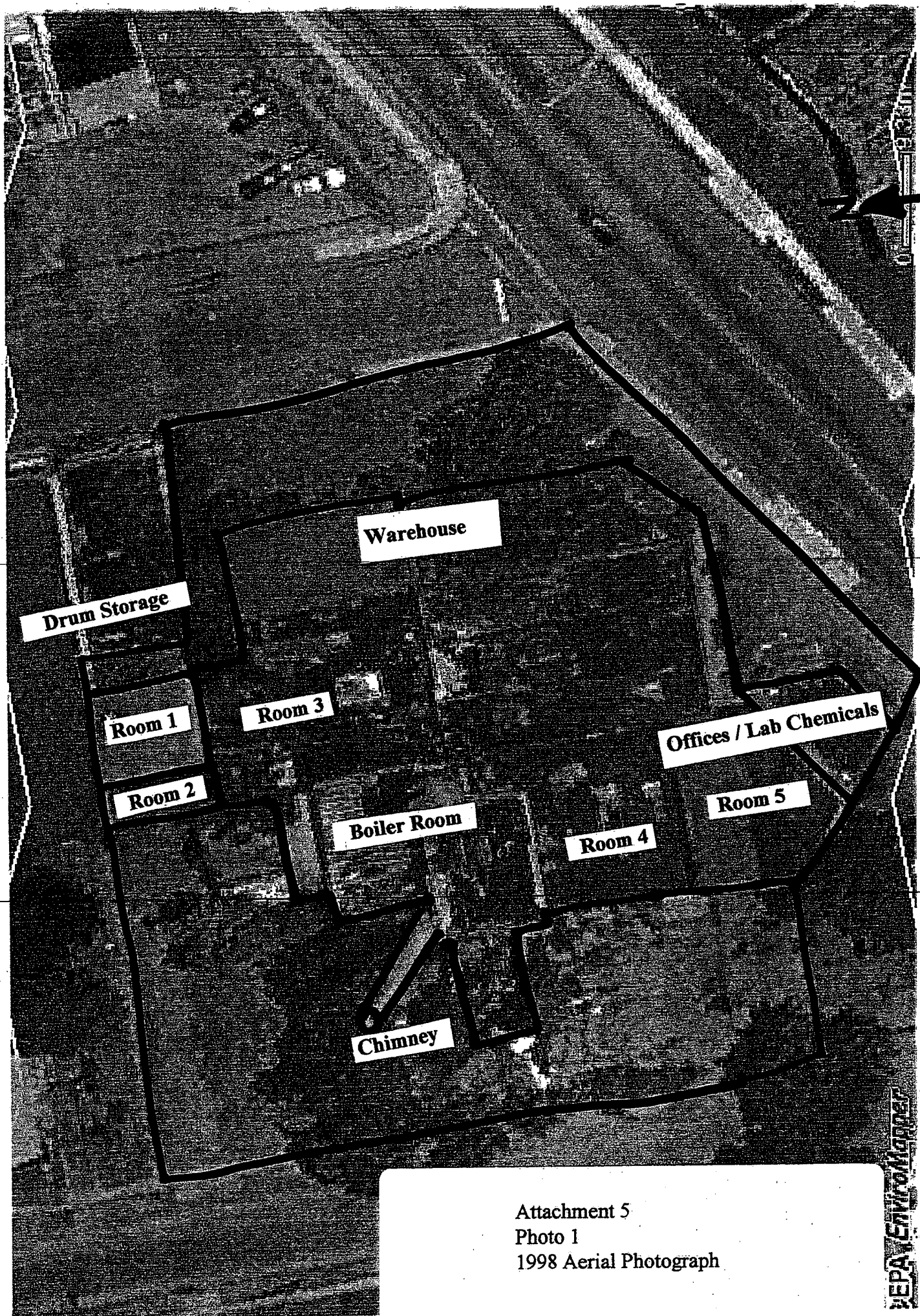
US ENVIRONMENTAL PROTECTION AGENCY
REMOVAL SUPPORT TEAM
CONTRACT # 68-W-00-113

ENTERED BY: W. HENSCHER

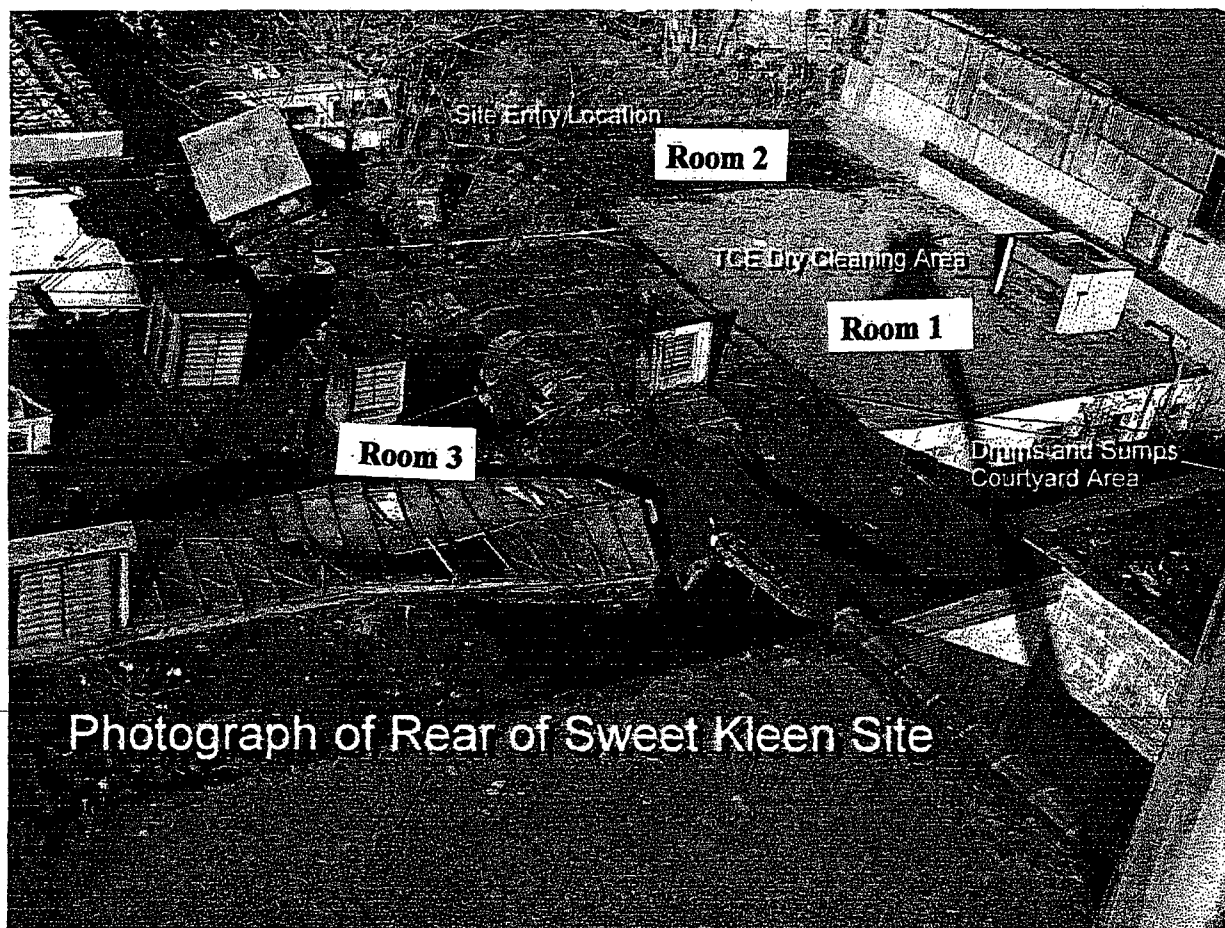
EPA OSC: K. HATHIES

SITE PROJECT MANAGER: A. LEVY

FILE: G:\DOW\SWEETKLEEN

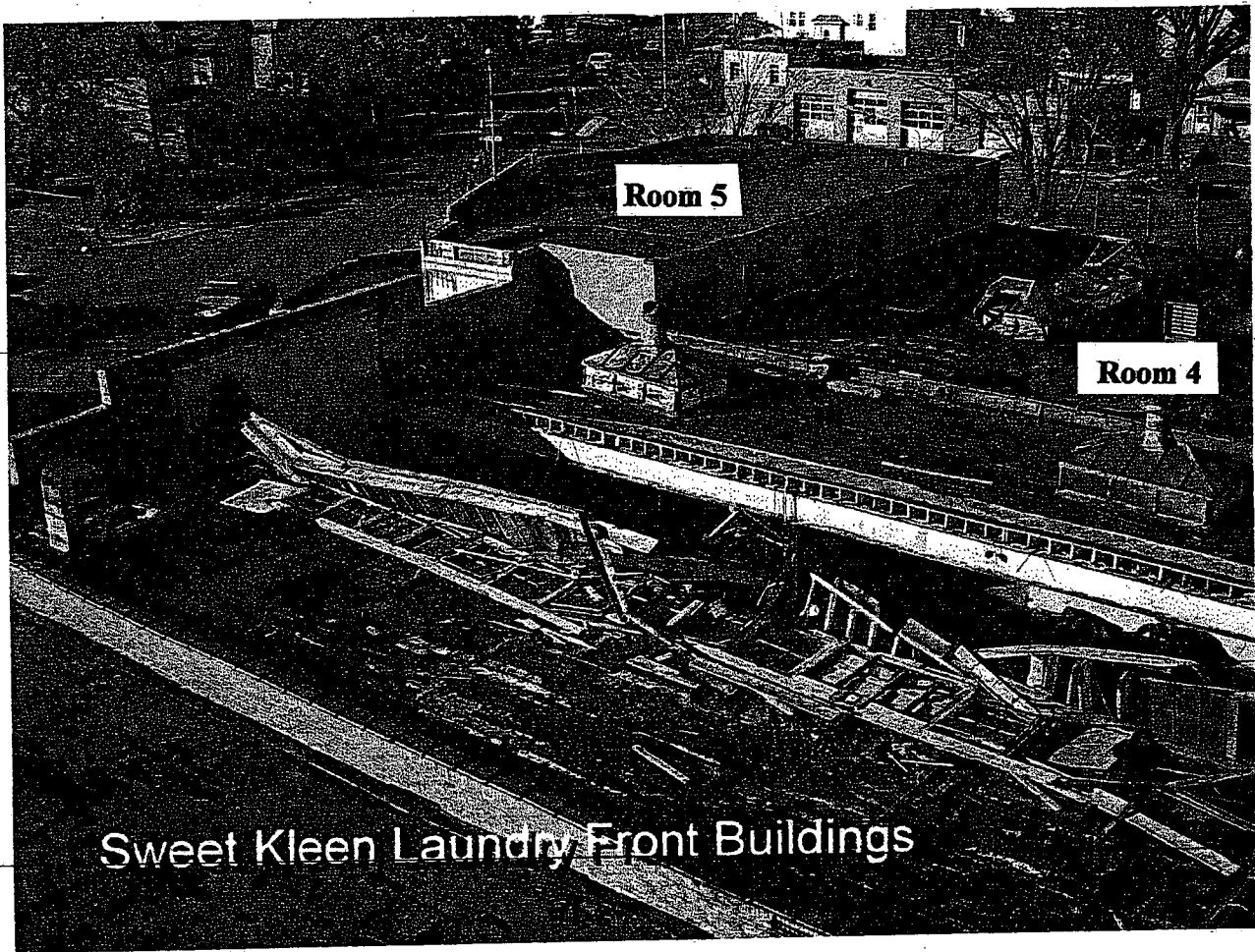


Attachment 5
Photo 1
1998 Aerial Photograph



Photograph of Rear of Sweet Kleen Site

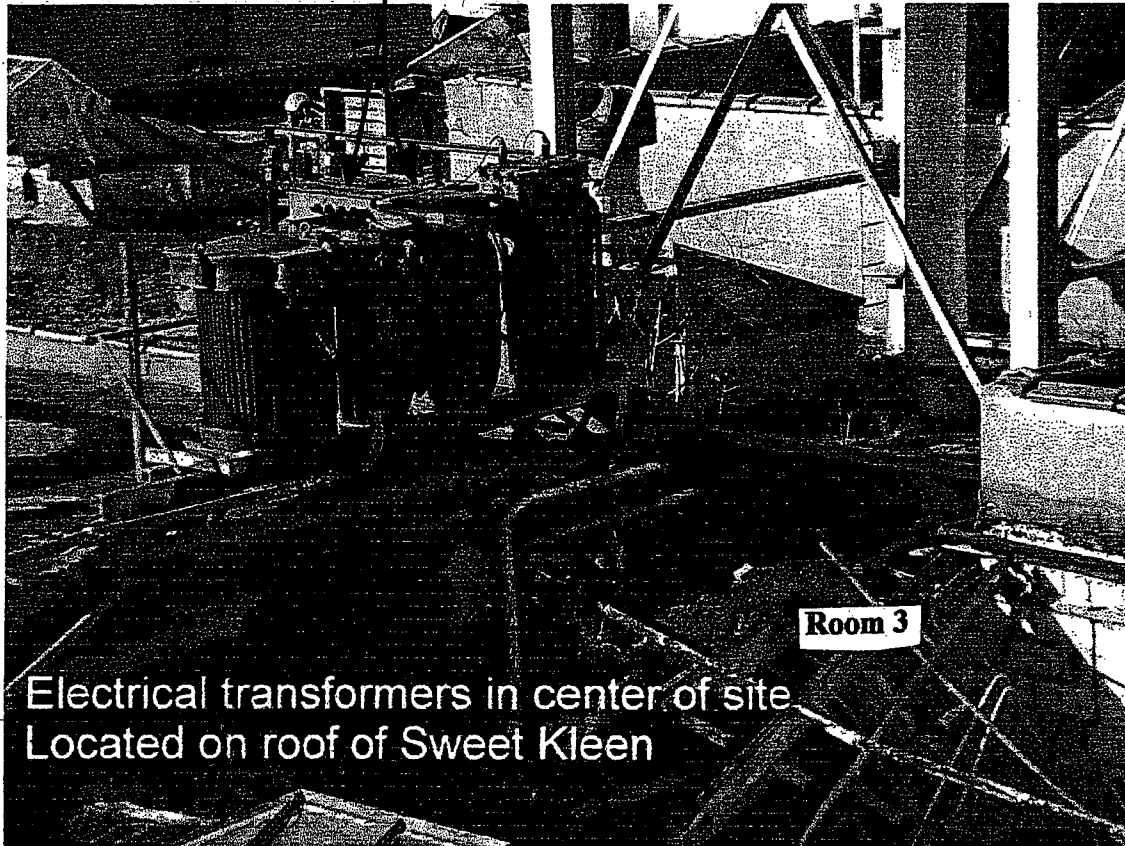
Attachment 5
Photo 2
Building Conditions



Sweet Kleen Laundry Front Buildings

Attachment 5
Photo 3
Building Conditions

2 opened



Electrical transformers in center of site
Located on roof of Sweet Kleen

Attachment 5
Photo 4
Electrical Transformers

SUBJECT: **ACTION MEMORANDUM TRANSMITTAL TO NEW YORK**
TO:

Hand Carried
By Lenore 6/5

Site Name: Sweet Kleen Site ID: UQ

Action (RV or BB)	#	Lead (F, RP)	Planned		Actual	
			Start	Complete	Start	Complete
RV	1	F			5/9/06	6/01/06

Action Memo #: 2

Date Signed: 1 / 1

Verbal Date: 1 / 1

Branch Approval Date: 6 / 5 / 06

Approval Authority: CERCLA

Type: (check all that apply)

- Original ☐
- 12 Month Exemption ☒
- Ceiling Increase ☐
- \$2 Million Exemption ☐
- Change in Response Scope ☐

Costs (\$): NO INCREASE REQUESTED

ERRS	RST	Other	Contingency	EPA	Total

Action Qualifier: (Select one) ☒ Clean up (action must complete clean up of the entire site)
☐ Stabilization

Action Category: (Select one) ☒ Time Critical
☐ Non-Time Critical
☐ Emergency

OSC Assigned: MATHEIS

Media Type ¹	Media Name ²	Response Action(s)	On/Off Site?
Soil	VOCs		

- 1) Air
Debris
Groundwater
Leachate
Liquid Waste
Other
Residuals
Sediment
Sludge
Soil
Solid Waste
Sub-Surface Soil
Surface Soil
Surface Water

2) Examples: Paints, Lagoon, Asbestos, etc.

ROUTING AND TRANSMITTAL SLIP

June 5, 2006

TO	(Name, office symbol, room number, building, Agency/Post)	Initials	Date
1.	Lieber- ORC-NYCSUP		
2.	McCabe-ERRD-DD		
3.	Pavlou - ERRD-D		
4.			
5.			
6.			
7.			

Action	File	Note and Return
Approval	For Clearance	Per Conversation
As Requested	For Correction	Prepare Reply
Circulate	For Your Information	See Me
Comment	Investigate	Signature
Coordinate	Justify	

REMARKS

Request for a 12-Month Exemption at
SWEET KLEEN LAUNDRY SITE
 Buffalo, Erie County, New York

DO NOT use this form as a RECORD of approvals, concurrences, disposals, clearances, and similar actions

FROM: (Name, org. symbol, Agency/Post)
 Rotola- ERRD-RAB

Room No. Bldg. Edison

Phone No. 6658